

**STATE ROUTE 710 FREEWAY EXTENSION (ROUTE 10 TO  
ROUTE 210) RECORD OF DECISION**

**RECORD OF ADDITIONAL COMMENTS RECEIVED ON  
ENVIRONMENTAL JUSTICE, HISTORIC PRESERVATION, AND  
OTHER ISSUES - VOLUME V**

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## **RECORD OF ADDITIONAL COMMENTS RECEIVED ON ENVIRONMENTAL JUSTICE, HISTORIC PRESERVATION, AND OTHER ISSUES - VOLUME V**

This volume includes comments received from 1994-97 by Caltrans and FHWA regarding Environmental Justice issues (pursuant to President Clinton's Executive Order 12898), historic preservation, and other issues related to the Route 710 Gap Closure project. A summary discussion of Environmental Justice and historic preservation status is provided below; more detailed information is provided for individual responses where necessary. Many of the letters included in this volume are letters of support or opposition to the project and do not require a response.

### ***Environmental Justice***

Consideration of environmental justice is a federal requirement (Executive Order 12898) that did not exist when the 1992 FEIS was prepared, although the requirements of 23 U.S.C. 109(h) and Title VI of the 1964 Civil Rights Act applied throughout the project planning and development. Section 109(h) requires the U.S. Department of Transportation to develop guidelines to implement NEPA and thereby "assure that possible adverse economic, social, and environmental effects relating to any proposed project on any federal-aid system have been fully considered" in developing transportation projects. Title VI of the 1964 Civil Rights Act prohibits discrimination on the basis of race, color, or national origin from participation or consideration in any programs or activities receiving federal aid.

The purpose of the environmental justice requirement is to identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of federal programs, policies, and activities on minority and low income populations. The Executive Order is based on Title VI of the 1964 Civil Rights Act. The Executive Order adds a requirement of documentation to Title VI responsibilities using the environmental process and also directs federal agencies to address low income populations.

After reviewing the history of the project, it is apparent that all decisions and policies with regard to the project have been administered based upon a neutral, objective basis. Mitigation has been provided on the basis of the specific impacts of the project. Where some types of mitigation are not possible, other mitigation measures have been provided. In addition, the special needs of El Sereno with respect to relocation and jobs have been accommodated with special programs. As a result, there are no disproportionate impacts upon minority or low income populations. A detailed discussion of the Route 710 project relative to Environmental Justice criteria is provided in the Environmental Reevaluation (April, 1998).

### ***Historic Preservation***

To satisfy the cultural resources aspects of the Council in Environmental Quality (CEQ) referral, the Historic Preservation Subcommittee<sup>1</sup> of the Mitigation Advisory Committee

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<sup>1</sup>Originally composed of the National Trust and the California Preservation Foundation/Los Angeles Conservancy, it eventually included representatives from the Pasadena

recommended a process for completing the identification (inventory) of historic resources, which included a dispute resolution clause in case of disagreement between Caltrans and consultants hired by local preservationists. The Third Supplemental Historic Architectural Survey Report (HASR) was prepared to survey and evaluate all of the previously referenced properties for *National Register of Historic Places* significance. The four volume Third Supplemental HASR was completed in March, 1994. The State Historic Preservation Officer (SHPO) was provided copies of the HASR on June 3, 1994. Consultations with the SHPO were ongoing throughout 1994 and into 1995. After the March 7, 1995, response by the State Historic Preservation Officer, disputed eligibility determinations were referred to the Keeper of the *National Register* for consultation/decision. The Keeper responded on November 20, 1995, by identifying one new historic district (Short Line Villa Tract Historic District) and expanding the boundaries of an existing historic district (Pasadena Avenue). The Keeper also determined that four (4) individual properties in the Short Line Villa Tract Historic District were eligible for the *National Register* on their own merits and that Bellmar Court (909-915 Summit Drive) was also eligible. An additional 47 properties in South Pasadena and 60 properties in Pasadena were determined to be not eligible for listing on the *National Register*.

On February 7, 1996, the Keeper issued determinations of eligibility on two additional properties and clarification of earlier eligibility evaluations (within the Pasadena Avenue Historic District). The Keeper determined that the Warren D. Clark House (930 Oliver Street) in South Pasadena was eligible, while the properties at 545 and 547 Prospect Avenue were determined to be not eligible.

The Fourth Supplemental Historic Architectural Survey Report was presented to the SHPO on September 5, 1996, with the determination that the two proposed districts of Gillette Crescent and Valley View Heights neighborhoods in South Pasadena were not eligible for the *National Register*. However, the Mabel Packard House at 2031 Berkshire Avenue was considered individually eligible. The SHPO responded on September 11, 1996, by concurring that the Mabel Packard House is eligible for the *National Register*, giving no opinion on the eligibility of the Gillette Crescent and Valley View Heights neighborhoods, and recommending that the two tracts in question be referred to the Keeper of the *National Register* for a determination of eligibility.

On February 24, 1997, the Keeper issued a determination of eligibility notification indicating that the Gillette Crescent Neighborhood and Valley View Heights Neighborhood were "not eligible" for listing in the *National Register*.

### ***Organization of Volume V Comments***

The comments have been summarized in a matrix that lists the commentor, the comment date, the issue noted in the comment, and (where applicable) a response to the comment. Each comment is numbered sequentially, with a prefix of "V" identifying the comment as part of Volume V of the Record of Comments Received. The fourth column of the matrix identifies the subject of the comment through the use of a coding system. The subject coding allows for future sorting or listing of comments by subject, if necessary. A listing of all subject codes is provided for reference on the page preceding the response to comments

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Heritage, the City of South Pasadena, the South Pasadena Cultural Heritage Commission, and the South Pasadena Preservation Foundation.

matrix. Responses are provided to all substantive comments received on these issues. Where the commentor renders an opinion on the project, the comment is acknowledged, but no response is required.

The comments are organized as follows:

<b>Comment Nos.</b>	<b>Commentor</b>
V-1	NAACP Legal Defense and Educational Fund, Inc.
V-2	Richard Alatorre, Councilman, 14th District, City of Los Angeles
V-3/25/30/70/208-211	City of Alhambra
V-4	Eileen Garcia
V-5	Aurora Castillo, Mothers of East Los Angeles
V-6	Xavier Becerra, Congressman, 30th District, California
V-7	Gloria Molina, Supervisor, Los Angeles County Board of Supervisors (First District)
V-8	NAACP Legal Defense and Educational Fund, Inc.
V-9	El Sereno Coordinating Council
V-10/V-12	Hilda L. Solis, State Senator, 24th Senatorial District
V-11	David Duran, El Sereno Coordinating Council
V-13	Dennis M. Perluss, Morrison & Foerster (counsel to the El Sereno Neighborhood Action Committee)
V-14/16/18/20/32/34 61/108/113/214	City of South Pasadena
V-15	Antonio Rossman
V-17/19/24/27-28/33	State Office of Historic Preservation
V-21/22	U.S. Department of the Interior
V-23/31/36/325-339/358-363	Advisory Council on Historic Preservation
V-26/129/232	710 Freeway Coalition
V-29	State of California Business, Transportation, and Housing Agency, and Resources Agency
V-35	U.S. Department of the Interior, National Park Service
V-37-41/223	American Society of Civil Engineers, Infrastructure Advisory Committee
V-42-46	U.S. Congressman Walter Tucker III

<b>Comment Nos.</b>	<b>Commentor</b>
V-47/48	U.S. Congressman Carlos J. Moorhead
V-49	U.S. Congressman Matthew G. Martinez
V-50	California Transportation Commission, Mary Berglund (Chairman)
V-51/201/340	State Senator Adam Schiff and Assemblyman Jack Scott
V-52/53	Los Angeles County Metropolitan Transportation Authority
V-54-56/72/73/ 78/95/98/109/207/212	City of Pasadena
V-57	City of Pasadena (Councilmember Ann-Marie Villicana for the 710 Freeway Coalition)
V-58	City of Pico Rivera
V-59/94	City of Azusa
V-60	City of Bell Gardens
V-62/92/99	City of Rosemead
V-63/90/100/111	City of Arcadia
V-64/93	City of Baldwin Park
V-65/91/101-102	City of Duarte
V-66	City of Long Beach
V-67/97/213	City of San Gabriel
V-68/73/216	City of Monterey Park
V-69/96	City of Cudahy
V-71	City of Los Angeles
V-74/217-219	South Pasadena Unified School District
V-75/215	City of Monrovia
V-76/89	Gap in numbering system
V-103/105	City of Alhambra Police Department
V-104	Alhambra School District
V-106	City of Montebello
V-107	City of Santa Clarita
V-110	City of Compton
V-112/124/127/202	Southern California Association of Governments

<b>Comment Nos.</b>	<b>Commentor</b>
V-114	Los Angeles/Orange Counties Building and Construction Trades Council
V-115-118/120-123/130/230-231	Sierra Club - Angeles Chapter
V-119	Automobile Club of Southern California
V-125	Mt. Washington Association, Highland Park Heritage Trust, and Highland Park Neighborhood Association
V-126	Southern California Contractors Association
V-128	The Green Group
V-131-199	Comment letters from various individuals
V-200	Council on Environmental Quality
V-203/206	Gap in numbering system
V-220/238-241	Citizens United to Save South Pasadena
V-221	No 710 - Neighbors Opposed to the 710 Freeway
V-224/225	Alhambrans for Traffic Solutions
V-226	Pasadena Heritage
V-227	The 710 Opposition Coalition
V-228	Westridge School
V-233-237	National Trust for Historic Preservation
V-242	Friends of the Earth
V-243-309	Comment letters from various individuals
V-310-324	United States Environmental Protection Agency
V-341	City of South Pasadena (Councilmember Harvey A. Knapp)
V-342-357	Comment letters from various individuals

## List of Subject Codes

Subject Code	Subject
AL	Alternatives
AQ	Air Quality
BIO	Biological Resources
CEQ	Council on Environmental Quality
C/N	CEQA/NEPA Issues
CON	Construction Impacts
CH	Cultural/Historic
CIR	Circulation/Traffic
CUM	Cumulative Impacts
EJ	Environmental Justice
FI	Fiscal Impacts
FU	Funding
GEO	Geotechnical
GI	Growth Inducement
HW	Hazardous Waste/Materials
HB	Housing/Business Relocation
II	Interim Improvements
LU	Land Use
MIS	Major Investment Study
MM	Mitigation Measures/Mitigation Monitoring
NOI	Noise
NEI	Not EIR/EIS Issue
NR	No Response Necessary
OB	Objectives
OP	Opinion
PD	Project Description
PH	Phasing
PP	Public Participation
PS	Public Services & Utilities
PN	Purpose and Need
RD	Request for Data
ROD	Record of Decision
VIS	Visual Resources
WR	Water Resources
4F	Section 4(f)

**Route 710 Volume V**  
**Response to Comments Matrix**

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-1	National Association for the Advancement of Colored People (NAACP) Legal Defense and Educational Fund, Inc.	2/28/95	EJ	Alleges that the Route 710 project violates Executive Order 12898 regarding Environmental Justice, stating that the project as proposed results in disproportionate impacts to the primarily minority community of El Sereno.	Project compliance with the criteria of Executive Order 12898 is addressed at length in the discovery phase of this litigation, as well as in the Environmental Reevaluation (April, 1998). This assessment concludes that "all decisions and policies regarding the project have been administered based upon a neutral, objective basis. Mitigation has been provided based on the specific impacts of the project. Where some types of mitigation are not possible, other mitigation measures have been provided. In addition, the special needs of El Sereno with respect to relocation and jobs have been accommodated with special programs. As a result, there are no disproportionate impacts upon minority or low income populations." Please refer to the Environmental Reevaluation (April, 1998) for detailed information which substantiates this conclusion.
V-2	Richard Alatorre, Councilman, 14th District, City of Los Angeles	3/22/95	EJ	Express concern that El Sereno is "getting the short end of the mitigation stick".	See Response to Comment V-1.
V-3	City of Alhambra	5/26/95	EJ	Addresses Environmental Justice concerns as outlined in the formal Environmental Justice complaint filed by the NAACP and the Natural Resources Defense Fund (NRDC) on 3/15/95.	Comment considered during the decision making process.



<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-4	Eileen Garcia	5/30/95	EJ	Requests that environmental justice issues stated in the complaint filed by the NAACP and the NRDC on 3/15/95 be addressed.	See Response to Comment V-1.
V-5	Aurora Castillo, Mothers of East Los Angeles	8/25/95	EJ	States that Mothers of East Los Angeles should not be named as a party to the complaint filed by the NAACP and the NRDC on 3/15/95.	Comment considered during the decision making process.
V-6	Xavier Becerra, Congressman, 30th District, California	8/25/95	CEQ	Requests expeditious action by the Council on Environmental Quality (CEQ) to review environmental issues associated with the Route 710 project.	Comment considered during the decision making process.
V-7	Gloria Molina, Supervisor, Los Angeles County Board of Supervisors (First District)	1/2/96	EJ	Requests that environmental justice issues be fully addressed.	See Response to Comment V-1.
V-8	NAACP Legal Defense and Educational Fund, Inc.	3/20/96	EJ	Requests that environmental justice issues be fully addressed before issuance of a Record of Decision (ROD).	See Response to Comment V-1.
V-9	El Sereno Coordinating Council	5/15/96	EJ	Requests inclusion of enhanced mitigation measures in the project prior to approval of the ROD, including: substantive training and job opportunities; incorporate meaningful citizen participation for planning, design, and construction phases; and, appointment of an "ombudsperson" to work with the communities regarding activities and compliance.	As documented in the Environmental Reevaluation (April, 1998) these measures have been added to the mitigation program for the Route 710 project.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-10-A V-10-B	Hilda L. Solis, State Senator, 24th Senatorial District	5/31/96	EJ ROD	These letters request that issues affecting El Sereno be fully addressed before issuance of an ROD.	See Responses to Comments V-1 and V-9.
V-11	David Duran, El Sereno Coordinating Council	6/15/96	EJ MM	Requests that specific measures consistent with the recommendations of the Route 710 Mitigation Advisory Committee be included in the project mitigation program.	As documented in the Environmental Reevaluation (April, 1998) these measures have been added to the mitigation program for the Route 710 project.
V-12	Hilda L. Solis, State Senator, 24th Senatorial District	7/29/96	MM	Requests that specific measures regarding relocation assistance, Sierra Vista School mitigation, job/business opportunities, noise, and the Huntington Boulevard interchange be included in the project mitigation program.	As documented in the Environmental Reevaluation (April, 1998) these measures have been added to the mitigation program for the Route 710 project.
V-13	Dennis M. Perluss, Morrison & Foerster (counsel to the El Sereno Neighborhood Action Committee)	10/1/97	EJ	Requests that a ROD not be issued until environmental justice issues are resolved.	See Response to Comment V-1.
V-14	City of South Pasadena	3/16/94	CH	Requests repairs to homes at 2002 and 2034 Berkshire.	These repairs have been made.
V-15	Antonio Rossman	6/1/94	OP	Presents opinions regarding inadequacy of Caltrans' staff report to the California Transportation Commission (CTC) regarding Route 710 route adoption.	Comment considered during the decision making process.
V-16	City of South Pasadena	6/27/94	CH	Requests repairs to home at 816 Bonita Drive (Grokowsky House).	These repairs have been made.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-17	State Office of Historic Preservation	1/30/95	CH	Documents provision of technical information to the Mitigation Advisory Committee regarding the Pasadena Avenue District in Pasadena, properties in El Sereno, and properties in South Pasadena. Also requests status of maintenance/repair of Caltrans-owned historic properties.	Comment considered during the decision making process.
V-18	City of South Pasadena	12/11/95	AL CH	By finding that historic resources in El Sereno are now eligible for protection, current Final Environmental Impact Statement/Final Environmental Impact Report (FEIS/FEIR) is legally inadequate. Further action requires a Supplemental EIS/EIR, which would also further evaluate low build alternative.	The issues raised in this letter regarding historic resources are fully addressed in the Final Revised Section 4(f) Evaluation and the Environmental Reevaluation (April, 1998).
V-19	State Office of Historic Preservation	2/14/96	CH	Concurs with the Federal Highway Administration's (FHWA's) determination that none of the properties evaluated in the inventory of properties affected by the alignment shift to avoid the Short Line Villa Tract Historic District appear to be eligible for the National Register of Historic Places.	Comment considered during the decision making process.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
V-20	City of South Pasadena	3/1/96	CH	Asserts that the document entitled <i>The Effect and Mitigation Proposal of Historic Properties Affected by the Route 710 Freeway Project</i> fails to address a number of important issues with regard to the affect of the revised alignment (the alignment shift to avoid the Short Line Villa Tract Historic District) on properties with architectural and historic significance.	The issues raised in this letter regarding historic resources are fully addressed in the Final Revised Section 4(f) Evaluation and the Environmental Reevaluation (April, 1998).
V-21	U.S. Department of the Interior	3/14/96	CH	Acknowledges receipt of letter from the City of South Pasadena.	Comment considered during the decision making process.
V-22	U.S. Department of the Interior	3/14/96	CH	Acknowledges receipt of revised Section 4(f) evaluation from FHWA.	Comment considered during the decision making process.
V-23	Advisory Council on Historic Preservation	4/22/96	CH	Provides comments on the document entitled <i>The Effect and Mitigation Proposal of Historic Properties Affected by the Route 710 Freeway Project</i> , including determinations of eligibility and effect, mitigation, and consideration of the Multi-Mode/Low Build proposal. The letter includes a statement of support for the Multi-Mode/Low Build proposal.	The issues raised in this letter regarding historic resources are fully addressed in the Final Revised Section 4(f) Evaluation and the Environmental Reevaluation (April, 1998). Caltrans' evaluation of the Low Build proposal demonstrates that it will not fulfill the purpose and need for the project, and will result in more severe air quality impacts than the Build Alternative.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
V-24	State Office of Historic Preservation (SHPO)	5/10/96	CH	Provides comments on the document entitled <i>The Effect and Mitigation Proposal of Historic Properties Affected by the Route 710 Freeway Project</i> , as well as the <i>Draft Revised Section 4(f) Evaluation</i> . States that the reports do not satisfactorily comply with applicable laws and statutes, and provides specific comments regarding historic property identification, determinations of effect, and treatment of historic properties. Also requests that FHWA prepare a Supplemental EIS.	The issues raised in this letter are fully addressed in the Final Revised Section 4(f) Evaluation and the Environmental Reevaluation (April, 1998).
V-25	City of Alhambra	7/19/96	CH	Provides opinions regarding the letter from the SHPO dated 5/10/96 (Comment No. V-24).	Comment considered during the decision making process.
V-26	710 Freeway Coalition	7/19/96	CH	Disagrees with comment letter by SHPO dated 5/10/96 and states the conclusions are unfounded. Urges FHWA to approve ROD for completion of Route 710 Freeway gap closure project.	Comment considered during the decision making process.
V-27	State Office of Historic Preservation (SHPO)	9/11/96	CH	Provides documentation that Caltrans and the SHPO have resolved the issues raised in the SHPO's letter of 5/10/96.	Comment considered during the decision making process.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
V-28	State Office of Historic Preservation (SHPO)	9/11/96	CH	Recommends that the issue of National Register eligibility for potential historic districts within the Gillette Crescent and Valley View Heights tracts of the City of South Pasadena be referred to the Keeper for resolution. Concur with National Register eligibility determination for the Mabel Packard House.	The Keeper of the <i>National Register</i> issued a determination of eligibility notification on February 24, 1997, indicating that the Gillette Crescent and Valley View Heights neighborhoods were “not eligible” for listing in the <i>National Register of Historic Places</i> .
V-29	State of California Business, Transportation, and Housing Agency, and Resources Agency	10/8/96	CH	Provides documentation that Caltrans and the SHPO have resolved the issues raised in the SHPO's letter of 5/10/96. Urges FHWA to approve ROD for completion of Route 710 Freeway gap closure project.	Comment considered during the decision making process.
V-30	City of Alhambra	9/18/96	CH	Disagrees with SHPO recommendation that the issue of National Register eligibility for potential historic districts within the Gillette Crescent and Valley View Heights tracts of the City of South Pasadena be referred to the Keeper for resolution.	Please refer to Response to Comment V-28.
V-31	Advisory Council on Historic Preservation	9/30/96	CH	Agrees with SHPO recommendation that the issue of National Register eligibility for potential historic districts within the Gillette Crescent and Valley View Heights tracts of the City of South Pasadena be referred to the Keeper for resolution.	Please refer to Response to Comment V-28.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-32	City of South Pasadena	10/3/96	CH	Submits information to the SHPO regarding the potential historic districts within the Gillette Crescent and Valley View Heights.	Please refer to Response to Comment V-28 regarding eligibility determinations for these properties.
V-33	State Office of Historic Preservation (SHPO)	10/8/96	CH	Recommends that FHWA refer the issue of National Register eligibility for potential historic districts within the Gillette Crescent and Valley View Heights tracts of the City of South Pasadena to the Keeper for resolution.	Please refer to Response to Comment V-28 regarding eligibility determinations for these properties.
V-34	City of South Pasadena	11/12/96	CH	Provides information to FHWA regarding potential historic districts within the Gillette Crescent and Valley View Heights tracts of the City of South Pasadena. Requests FHWA to follow up with Caltrans on other historic preservation issues.	The issues raised in this letter are fully addressed in the Final Revised Section 4(f) Evaluation and the Environmental Reevaluation (April, 1998).
V-35	U.S. Department of the Interior	4/17/97	CH	States that the Department of the Interior is unable to concur with the Route 710 project until a Memorandum of Agreement is concluded with the SHPO and ACHP regarding measures to avoid or minimize harm to historic resources.	A Memorandum of Agreement will not be prepared as there is a failure to agree.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-36	Advisory Council on Historic Preservation	9/30/97	CH ALT	ACHP agrees that the historic property inventory is complete, but does not concur with FHWA's assessment of effects on historic properties (no effect determination) which are inconsistent with 36 CFR 800.9, or with FHWA's inaccurate identification and assessment of ACHP-supported low build alternative.	FHWA has concurred with ACHP on its assessment of effects on historic properties.
V-37	American Society of Civil Engineers, Infrastructure Advisory Committee	5/1/95	ALT	Letter to Caltrans requesting a change in route adoption from the Meridian Variation Route to the proposed "Compromise Route".	The proposed "Compromise Route" appears to be a combination of the "Dorchester I Alternative" south of South Pasadena and the "Historic Preservation Bypass Route" north of the southern City limit. Both of these routes were among the 24 alternatives addressed in the Final EIS. Having analyzed an extensive range of alternatives, Caltrans recommended the "Meridian Variation Alternative" as the preferred alternative.
V-38	American Society of Civil Engineers, Infrastructure Advisory Committee	5/1/95	ALT	Letter to the CTC requesting a change in route adoption from the Meridian Variation Route to the proposed "Compromise Route".	See Response to Comment V-37.
V-39	American Society of Civil Engineers, Infrastructure Advisory Committee	5/1/95	ALT	Letter to FHWA requesting a change in route adoption from the Meridian Variation Route to the proposed "Compromise Route".	See Response to Comment V-37.
V-40	American Society of Civil Engineers, Infrastructure Advisory Committee	6/4/97	ALT	Letter to Governor Pete Wilson requesting a change in route adoption from the Meridian Variation Route to the proposed "Compromise Route".	See Response to Comment V-37.



Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
V-41	American Society of Civil Engineers, Infrastructure Advisory Committee	6/16/97	ALT	Letter to FHWA requesting a change in route adoption from the Meridian Variation Route to the proposed "Compromise Route".	See Response to Comment V-37.
V-42	U.S. Congressman Walter Tucker III	6/21/94	PD	Section 103 of HR 4385 requires that before any federal funds be made available for any federal aid highway activity (i.e., Route 710), a value engineering review be undertaken as a prerequisite to obtaining an ROD, and therefore request the CTC to promptly convene a panel of experts to perform a value engineering review. Would include an assessment of the various alternatives.	After 20 years of environmental studies and the preparation of four Draft EISs, analyzing some 24 alternatives, and with the work of a Mitigation and Enhancement Advisory Committee, value engineering has been completed.
			AL AQ FI	Request notification prior to ROD of (1) Evaluation, if any (by either by CTC, Caltrans LARTS, or other) of the major proposals submitted for Route 710 project in light of the proposed truck ban and the effect of the ban on the comparative performance of the competing proposals; (2) Consideration by either Caltrans or CTC of the 3/10/94 FHWA guidance concerning nitrogen oxide (NOX) emissions in Los Angeles ozone nonattainment area in the context of National Environmental Policy Act (NEPA) evaluation process for build vs low build alternatives; and	Please refer to the "State Route 710 - A Modal Evaluation of the City of South Pasadena's Multi-Modal Low Build Proposal" (April, 1996) for a discussion of these issues.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
V-42 (continued)	U.S. Congressman Walter Tucker III (continued)	6/21/94	FU	(3) Any action taken by Caltrans or CTC to comply with 11/29/93 FHWA guidance issued by FHWA in 23 CFR 450.318 re: Major Metropolitan Transportation Investments (MMTI) and the required analysis of additional alternatives if ROD for Route 710 project has not been approved at time of effective date of new regulations.	On January 10, 1995, the Major Investment Review Committee met and determined that the Route 710 Gap Closure project was to be "grandfathered," as provided by federal regulations, having been classified as a Category 2 project. This finding was memorialized in a February 21, 1995, letter to Caltrans from the Southern California Association of Governments (SCAG). This letter is provided as Comment No. V-125.
			OP	Final decision on Route 710 should be comprehensive and objective, and comply with all relevant statutory and regulatory requirements.	The FHWA has every intention of complying with all relevant and statutory regulatory requirements. A final decision will be based on an objective and comprehensive analysis of all pertinent facts.
V-43	U.S. Congressman Walter Tucker III	6/24/94	OP	Transmits to FHWA his letter dated 6/21/94 to the CTC.	See Response to Comment V-42.
V-44	U.S. Congressman Walter Tucker III	10/3/94	MIS	Requests FHWA determination on whether the Route 710 project complies with federal environmental and Major Investment Study (MIS), formerly referred to as MMTI, requirements.	See Response to Comment V-42.
V-45	U.S. Congressman Walter Tucker III	10/28/94	MIS	Requests that FHWA defer action on Route 710 until the National Highway System bill is complete. Requests response from FHWA regarding MIS process.	See Response to Comment V-42.
V-46	U.S. Congressman Walter Tucker III	11/22/94	MIS	Provides opinions on compliance with MIS requirements.	See Response to Comment V-42. MIS compliance is also addressed in the Environmental Reevaluation (April, 1998).

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-47	U.S. Congressman Carlos J. Moorhead	12/6/94	MIS	Requests that a Category 3 MIS be prepared for the Route 710 project.	See Response to Comment V-42. MIS compliance is also addressed in the Environmental Reevaluation (April, 1998).
V-48	U.S. Congressman Carlos J. Moorhead	1/26/95	MIS	Requests that a Category 3 MIS be prepared for the Route 710 project.	See Response to Comment V-42. MIS compliance is also addressed in the Environmental Reevaluation (April, 1998).
V-49	U.S. Congressman Matthew G. Martinez	2/2/95	OP	Requests progress toward completion of the CEQ process and approval of the ROD.	Comment considered during the decision making process.
V-50	California Transportation Commission, Mary Berglund (Chairman)	12/2/96	OP	Urges FHWA to sign ROD in favor of completing Route 710.	Comment considered during the decision making process.
V-51	State Senator Adam Schiff and Assemblyman Jack Scott	12/23/96	OP	Expresses opposition to project due to adverse impacts on Pasadena and South Pasadena.	Comment considered during the decision making process.
V-52	Los Angeles County Metropolitan Transportation Authority	4/4/95	FU	Although the Metropolitan Transportation Authority (MTA) Board Members recognize that Caltrans is the lead agency for environmental clearance of the project, the Board expressed its environmental concerns with a condition for programming additional funding for the project.	Comment considered during the decision making process.
V-53	Los Angeles County Metropolitan Transportation Authority	12/20/95	OP	Supports completion of Route 710 extension.	Comment considered during the decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-54	City of Pasadena	9/12/95	OP	Supports completion of Route 710 Freeway extension and opposes low build alternative.	Comment considered during the decision making process.
V-55	City of Pasadena	12/1/95	OP	Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-56	City of Pasadena	11/12/96	OP	Urges FHWA to sign ROD in favor of completing Route 710. All requirements of ROD have been met and completion would solve issues involving safety, air quality and traffic congestion.	Comment considered during the decision making process.
V-57	City of Pasadena (Councilmember Ann-Marie Villicana for the 710 Freeway Coalition)	7/8/96	OP	Urges FHWA to approve ROD for completion of Route 710 extension.	Comment considered during the decision making process.
V-58	City of Pico Rivera	10/14/93	OP	Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-59	City of Azusa	12/2/93	OP	Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-60	City of Bell Gardens	12/6/93	OP	Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-61	City of South Pasadena	9/12/94	CIR FU	CTC should not approve completion of Route 710 Freeway extension when the required conformity and MMTI analysis have not been completed, and cannot be completed based upon existing FEIS/FEIR.	See Response to Comment V-42. MIS compliance is also addressed in the Environmental Reevaluation (April, 1998).
V-62	City of Rosemead	4/17/95	OP	Supports completion of Route 710 Freeway extension as the project will improve air quality, reduce traffic congestion on surface streets, reduce commute times, provide jobs, and save money.	Comment considered during the decision making process.
V-63	City of Arcadia	4/17/95	OP	Supports completion of Route 710 Freeway extension.	Comment considered during the decision making process.
V-64	City of Baldwin Park	4/18/95	OP	Supports completion of Route 710 Freeway extension.	Comment considered during the decision making process.
V-65	City of Duarte	4/18/95	OP	Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-66	City of Long Beach	4/19/95	OP	Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-67	City of San Gabriel	4/24/95	OP	Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-68	City of Monterey Park	4/24/95	OP	Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-69	City of Cudahy	4/25/95	OP	Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-70	City of Alhambra	5/19/95	OP	Based on statements made by City of South Pasadena officials, no matter what type of mitigation is presented, the opponents will always oppose freeway. Therefore, mitigation is not feasible and urge FHWA to issue ROD.	Comment considered during the decision making process.
V-71	City of Los Angeles	9/8/95	OP AL	Low build alternative is flawed, unworkable, and based on theoretical rather than practical assumptions. Therefore, request FHWA to rescind letter to Caltrans requesting more data on low build alternative and urge FHWA to issue ROD.	Comment considered during the decision making process.
V-72	City of Pasadena	9/12/95	OP	Supports completion of Route 710 Freeway extension and opposes low build alternative.	Comment considered during the decision making process.
V-73	City of Pasadena	9/13/95	OP	Supports completion of Route 710 Freeway extension and opposes low build alternative.	Comment considered during the decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-74	South Pasadena Unified School District	9/21/95	AL	The Route 710 Freeway extension will severely affect the school district. Request that all alternatives be given a fair evaluation, including multi-mode/low build alternative.	Caltrans has studied 16 "Low-Build" or partial completion proposals in past environmental documents. They were discussed in the Final EIR/EIS and can be found starting on page II-111 of the Final EIR/EIS. Additional discussion is provided in the Environmental Reevaluation (April, 1998). Caltrans' primary reason for rejecting the "Low-Build" or partial completion proposals was that they had insufficient traffic capacity to meet local and regional demand.
V-75	City of Monrovia	11/21/95	OP	Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-76 to V-89	None	None		Note: There is a gap in Volume V comment numbering from V-76 through V-89.	
V-90	City of Arcadia	11/22/95	OP	Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-91	City of Duarte	11/22/95	OP	Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-92	City of Rosemead	11/22/95	OP	Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-93	City of Baldwin Park	11/28/95	OP	Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-94	City of Azusa	11/30/95	OP	Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-95	City of Pasadena	12/1/95	OP	Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-96	City of Cudahy	12/5/95	OP	Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-97	City of San Gabriel	12/6/95	OP	Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-98	City of Pasadena	12/20/95	OP	Pasadena opts to take no position on the Route 710 Freeway extension project or the low build alternative.	Comment considered during the decision making process.
V-99	City of Rosemead	12/21/95	OP	Low Build alternative is not feasible solution. Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-100	City of Arcadia	12/26/95	OP	Low Build alternative is not feasible solution. Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-101	City of Duarte	12/26/95	OP	Low Build alternative is not feasible solution. Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.



<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-102	City of Duarte	3/25/96	OP	Reaffirms support for completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-103	City of Alhambra Police Department	2/15/96	OP	Reaffirms support for completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-104	Alhambra School District	2/15/96	OP	Reaffirms support for completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-105	City of Alhambra Police Department	2/21/96	OP	Reaffirms support for completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-106	City of Montebello	2/26/96	OP	Reaffirms support for completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-107	City of Santa Clarita	2/27/96	OP	Reaffirms support for completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-108	City of South Pasadena	3/28/96	OP	Supports a mediated environmental settlement involving all parties to resolve the many issues of this project.	Caltrans views mediation as duplicative of previous dialogues and no formal mediation is currently proposed.
V-109	City of Pasadena	4/15/96	OP	Reaffirms support for completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-110	City of Compton	5/29/96	OP	Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-111	City of Arcadia	5/29/96	OP	Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.
V-112	Southern California Association of Governments	10/9/97	NR	Describes SCAG's role in development and evaluation of an interim project for inclusion in the Regional Transportation Plan.	Comment considered during the decision making process.
V-113	City of South Pasadena	10/17/97	ROD	Presents conditions that the City believes should be met before FHWA can approve a ROD.	Comment considered during the decision making process. The issues raised by the City will be considered by FHWA in considering approval of the ROD.
V-114	Los Angeles/Orange Counties Building and Construction Trades Council (Richard Slawson)	10/2/96	OP	Urges FHWA to sign ROD in favor of completing Route 710 in order to alleviate traffic congestion on surface streets, air pollution, and the concern that a delay in approving the ROD would have a negative impact on jobs and the environment in the area.	Comment considered during the decision making process.
V-115	Sierra Club - Angeles Chapter (Stanley Hart)	8/1/96	OP	Opposes the Route 710 project as a poor investment of public funds, stating that the cost/benefit analysis is flawed. Requests that a Supplemental EIS be prepared.	Documentation is provided in the Environmental Reevaluation (April, 1998) supporting FHWA's determination that a Supplemental EIS is not required.
V-116	Sierra Club - Angeles Chapter (Stanley Hart)	11/27/96	OB	Project provides no transportation benefit. EIS justification is patently flawed and time saved figures are untrue and/or inaccurate.	The transportation benefits of the project are stated in the Purpose and Need Sections of the Final EIR/EIS and the Environmental Reevaluation (April, 1998).

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V-117	Sierra Club - Angeles Chapter (Stanley Hart)	11/27/96	OP	The nation's economic future is placed at risk because of America's addiction to automobile commuting. The 710 extension would only deepen that addiction.	Comment considered during the decision making process.
V-118	Sierra Club - Angeles Chapter (Stanley Hart)	11/27/96	PN	Requests that a balanced committee be convened for investigation of justification criteria. Questions objectivity of project purpose and need and recommends reevaluation by impartial panel prior to approval of FEIS.	As stated in the response letter dated 2/5/97 from FHWA Administrator Rodney Slater, a justification committee is not needed or practical because of the polarization of views between highway and transit advocates.
V-119	Automobile Club of Southern California (Thomas McKernan)	12/11/95	OP	Strongly urge FHWA to approve ROD because completion of Route 710 will reduce noise and air pollution, increase safety, and minimize neighborhood deterioration.	Comment considered during the decision making process.
V-120	Sierra Club - Angeles Chapter (Stanley Hart)	8/30/95	OP	Urge FHWA to veto approval of extension of Route 710 and instead use funds toward rebuilding rail transit system for Los Angeles.	Comment considered during the decision making process.
V-121	Sierra Club - Angeles Chapter (Stanley Hart)	9/8/95	AL	Urge FHWA to not approve ROD for completion of Route 710 and instead ask that EIR/EIS be revised to include an in-depth study of low build and other alternatives.	Please refer to the Environmental Reevaluation (April, 1998) for a discussion on the reasons why a Supplemental Draft Environmental Impact Statement (SDEIS) is not required.
V-122	Sierra Club - Angeles Chapter (Stanley Hart)	9/16/95	AL	Urge FHWA to not approve ROD for completion of Route 710 and instead ask that EIR/EIS be revised to include an in-depth study of low build and other alternatives.	Please refer to the Environmental Reevaluation (April, 1998) for a discussion on the reasons why a SDEIS is not required.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-123	Sierra Club - Angeles Chapter (Stanley Hart)	1/2/97	OP	Urge FHWA to not approve ROD for completion of Route 710 and requests a balanced committee be convened for investigation of justification criteria.	See Response to Comment V-118.
V-124	Southern California Association of Governments	2/21/95	FU	Findings of the Major Investment Study (MIS) Review Committee indicate that FHWA, Federal Transit Administration (FTA), Caltrans, MTA, and SCAG are in agreement that Route 710 gap closure project has met the MIS requirements set forth in the Metropolitan Planning Rules and is grandfathered as a Category Two project, meaning that no further analysis or study is needed to meet MIS requirements.	Comment considered during the decision making process. This is the Route 710 MIS compliance letter.
V-125	Mt. Washington Association, Highland Park Heritage Trust, and Highland Park Neighborhood Association	9/8/95	OP ALT	Opposes completion of Route 710 Freeway extension and supports non-freeway alternatives.	Comment considered during the decision making process.
V-126	Southern California Contractors Association	11/21/95	OP	Supports completion of Route 710 Freeway extension and urges FHWA to issue ROD.	Comment considered during the decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-127	Southern California Association of Governments	4/9/96	CIR AQ	Supports completion of the Route 710 Freeway gap closure project which is consistent with SCAG's adopted policies for facility development, transit programs, high occupancy vehicle (HOV) programs, and Goods Movement Plan. It is also part of the adopted Regional Transportation Plan (RTP) and the Air Quality Management Plan (AQMP).	Comment considered during the decision making process.
V-128	The Green Group	4/29/96	FU ALT	Opposes completion of Route 710 Freeway gap closure project and urges FHWA to disapprove federal funding for the project. Supports the Multi-Mode/Low Build proposal.	Comment considered during the decision making process.
V-129	710 Freeway Coalition	9/9/96	OP	Disagrees with Deputy Secretary Garamendi's request for a Supplemental EIS. Urges FHWA to approve ROD for completion of Route 710 Freeway gap closure project.	See Response to Comment V-115.
V-130	Sierra Club - Angeles Chapter	5/12/97	OP NEI	Acknowledges that suggestion to form a justification committee is not realistic. Requests FHWA to instead form a task force to obtain data and make financial cost calculations, then make the data available for public review.	Given the polarization of viewpoints between highway and transit advocates, forming a task force to obtain data and make financial cost calculations, which would then be made available for public scrutiny, is not needed nor is it practical. It would be virtually impossible for such a task force to produce a credible document that would bridge the polarized viewpoints or alter transportation patterns.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-131	Michael Renaud-Wright	8/9/95	OP	Supports completion of Route 710 extension.	Comment considered during the decision making process.
V-132	Cherri Y. Houser	1/20/96	OP	Opposes completion of Route 710 extension. Supports low build alternative, which would minimize expenditures and disruption to the residents.	Comment considered during the decision making process.
V-133	Piero E. and Lucy J. Danni	2/12/96	OP	Supports completion of Route 710 extension and urges FHWA to approve the ROD.	Comment considered during the decision making process.
V-134	Robert Barclay	2/13/96	OP	Supports completion of Route 710 extension and urges FHWA to approve the ROD.	Comment considered during the decision making process.
V-135	William R. Anderson	2/17/96	OP	Supports completion of Route 710 extension and urges FHWA to approve the ROD.	Comment considered during the decision making process.
V-136	Laura B. Hartenstein	2/19/96	OP	Supports completion of Route 710 extension and urges FHWA to approve the ROD.	Comment considered during the decision making process.
V-137	Jusak Yang Bernhard	2/20/96	OP	Supports completion of Route 710 extension and urges FHWA to approve the ROD.	Comment considered during the decision making process.
V-138	Charles Hofgaarden	2/21/96	OP	Supports completion of Route 710 extension and urges FHWA to approve the ROD.	Comment considered during the decision making process.
V-139	Trent Miller	2/22/96	OP	Supports completion of Route 710 extension and urges FHWA to approve the ROD.	Comment considered during the decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-140	David (last name illegible)	2/22/96	OP	Supports completion of Route 710 extension and urges FHWA to approve the ROD.	Comment considered during the decision making process.
V-141	Mr./Mrs. G.E. Melmud (sp?)	Undated; received by FHWA 2/22/96	OP	Supports completion of Route 710 extension and urges FHWA to approve the ROD.	Comment considered during the decision making process.
V-142	Wally Tsui	2/25/96	OP	Supports completion of Route 710 extension and urges FHWA to approve the ROD.	Comment considered during the decision making process.
V-143	Gillian Gough	4/18/96	OP	Opposes completion of Route 710 extension and requests FHWA to refer the project back to the State for mediation and preparation of a new EIR/EIS.	No formal mediation is currently proposed at this time. Documentation is provided in the Environmental Reevaluation (April, 1998) supporting FHWA's determination that a Supplemental EIS is not required.
V-144	Pedro Solis	4/20/96	OP	Opposes completion of Route 710 extension and requests FHWA to refer the project back to the State for mediation and preparation of a new EIR/EIS.	See Response to Comment V-143.
V-145	Carmen Buffin	4/21/96	OP	Supports completion of Route 710 extension and urges FHWA to approve the ROD.	Comment considered during the decision making process.
V-146	Andrew G. Ewing, Jr.	4/24/96	OP	Supports completion of Route 710 extension and urges FHWA to approve the ROD.	Comment considered during the decision making process.
V-147	Irving and Matilda Feuer	4/26/96	OP	Opposes completion of Route 710 extension and requests FHWA to refer the project back to the State for mediation.	See Response to Comment V-143.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-148	Maximiano Martinez	5/25/96	OP	Supports completion of Route 710 extension and urges FHWA to approve the ROD.	Comment considered during the decision making process.
V-149	Kesel Thompson	No date	OP	In favor of completing Route 710.	Comment considered during the decision making process.
V-150	Irene Delgado	5/2/97	OP	Urging Caltrans to complete Route 710 which would alleviate congestion, prevent accidents, reduce travel time, and improve air quality. May result in creation of jobs, increase in businesses.	Comment considered during the decision making process.
V-151	Jeremiah O'Neill	5/2/97	OP	Urging Caltrans to complete Route 710 which would alleviate congestion, prevent accidents, reduce travel time, and improve air quality. May result in creation of jobs, increase in businesses.	Comment considered during the decision making process.
V-152	Marie Kronheimer	5/2/97	OP	Urging Caltrans to complete Route 710 which would alleviate congestion, prevent accidents, reduce travel time, and improve air quality. May result in creation of jobs, increase in businesses.	Comment considered during the decision making process.
V-153	Nicholas and Eleanor Fitzgerald	5/12/97	OP	In favor of completing of Route 710 extension.	Comment considered during the decision making process.
V-154	[signature illegible]	5/14/97	OP	Urging Caltrans to complete Route 710 which would alleviate congestion, prevent accidents, reduce travel time, and improve air quality. May result in creation of jobs, increase in businesses.	Comment considered during the decision making process.



<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-155	Allyson Forden	5/16/97	OP	Urging Caltrans to complete Route 710 which would alleviate congestion, prevent accidents, reduce travel time, and improve air quality. May result in creation of jobs, increase in businesses.	Comment considered during the decision making process.
V-156	George Higgins	No date	OP	Urging Caltrans to complete Route 710 which would alleviate congestion, prevent accidents, reduce travel time, and improve air quality. May result in creation of jobs, increase in businesses.	Comment considered during the decision making process.
V-157	Armida Dennis	No date	OP	Urging Caltrans to complete Route 710 which would alleviate congestion, prevent accidents, reduce travel time, and improve air quality. May result in creation of jobs, increase in businesses.	Comment considered during the decision making process.
V-158	Annette LaFranchi	No date	OP	Urging Caltrans to complete Route 710 which would alleviate congestion, prevent accidents, reduce travel time, and improve air quality. May result in creation of jobs, increase in businesses.	Comment considered during the decision making process.
V-159	Levada J. Good	No date	OP	Urging Caltrans to complete Route 710 which would alleviate congestion, prevent accidents, reduce travel time, and improve air quality. May result in creation of jobs, increase in businesses.	Comment considered during the decision making process.
V-160	Lois A. Aylis	No date	OP	Urging Caltrans to complete Route 710 which would alleviate congestion, prevent accidents, reduce travel time, and improve air quality. May result in creation of jobs, increase in businesses.	Comment considered during the decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-161	[signature illegible]	No date	OP	Urging Caltrans to complete Route 710 which would alleviate congestion, prevent accidents, reduce travel time, and improve air quality. May result in creation of jobs, increase in businesses.	Comment considered during the decision making process.
V-162	Joan Knightler (?)	5/14/97	OP	Urging Caltrans to complete Route 710 which would alleviate congestion, prevent accidents, reduce travel time, and improve air quality. May result in creation of jobs, increase in businesses.	Comment considered during the decision making process.
V-163	[signature illegible]	No date	OP	Urging Caltrans to complete Route 710 which would alleviate congestion, prevent accidents, reduce travel time, and improve air quality. May result in creation of jobs, increase in businesses.	Comment considered during the decision making process.
V-164	Aurora A. Zorrilla	6/2/97	OP	Urging Caltrans to complete Route 710 which would alleviate congestion, prevent accidents, reduce travel time, and improve air quality. May result in creation of jobs, increase in businesses.	Comment considered during the decision making process.
V-165	Mitchell J. Miliias	6/23/97	OP	Urging Caltrans to complete Route 710 which would alleviate congestion, prevent accidents, reduce travel time, and improve air quality. May result in creation of jobs, increase in businesses.	Comment considered during the decision making process.
V-166	Jose Clift	No date	OP	Urging Caltrans to complete Route 710 which would alleviate congestion, prevent accidents, reduce travel time, and improve air quality. May result in creation of jobs, increase in businesses.	Comment considered during the decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-167	Sean Green	No date	OP	Urging Caltrans to complete Route 710 which would alleviate congestion, prevent accidents, reduce travel time, and improve air quality. May result in creation of jobs, increase in businesses.	Comment considered during the decision making process.
V-168	Stanley K. Hanson	No date	OP	Urging Caltrans to complete Route 710 which would alleviate congestion, prevent accidents, reduce travel time, and improve air quality. May result in creation of jobs, increase in businesses.	Comment considered during the decision making process.
V-169	Don R. Boaz	7/12/97	OP	Urging Caltrans to complete Route 710 which would alleviate congestion, prevent accidents, reduce travel time, and improve air quality. May result in creation of jobs, increase in businesses.	Comment considered during the decision making process.
V-170	Chris Lang (Westway Electric Systems, Inc.)	11/1/96	OP	Reaffirm support for completion of Route 710 extension and urging FHWA to sign ROD.	Comment considered during the decision making process.
V-171	Rick Cole	9/12/95	C/N	Urges FHWA to consider initiating an open mediation process involving all affected communities before making a decision on ROD.	FHWA is committed to ensuring that decisions will be rendered only after a full and thorough analysis of all issues in accordance with NEPA and other environmental and related laws, regulations, and policies.
V-172	Sami Elmaalouf, The Levantine Engineers Society	3/8/96	OP	Strongly urges FHWA to approve ROD for completion of Route 710 Freeway gap closure project.	Comment considered during the decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-173	Diana Stoney	8/31/95	OP	Financially wrong to spend over a billion dollars to build a 6.2-mile freeway segment that will add to air and water pollution and increase traffic congestion. Urges FHWA to end Route 710 Freeway at I-10 and designate the additional completed distance beyond I-10 as a state roadway.	A comprehensive analysis was performed by Caltrans and FHWA showed the Build Alternative to be more cost-effective than the No Build Alternative and the Multi-Mode/Low Build proposal.
V-174	Richard D. Schneider, M.D.	8/31/95	OP	Strongly urges FHWA not to sign ROD for Route 710 Freeway extension due to the cost, the presence of alternative solutions, and the impacts to lower income, ethnically diverse neighborhoods.	Please refer to Response to Comment V-173. In addition, please refer to the Environmental Reevaluation (April, 1998) for a discussion on the impacts and benefits of the proposed project to ethnically diverse communities along the corridor.
V-175	Joaquin Gutierrez	9/2/95	OP	Opposes completion of Route 710 Freeway extension because of impacts to lower income, ethnically diverse neighborhoods and the impacts to public health.	Please refer to Response to Comment V-173. In addition, please refer to the Environmental Reevaluation (April, 1998) for a discussion on the impacts and benefits of the proposed project to ethnically diverse communities along the corridor.
V-176	Sue Nelson	9/11/95	OP	Opposes completion of Route 710 Freeway extension and favors Multi-Mode/Low Build proposal.	Comment considered during the decision making process.
V-177	Patricia A. Pierce	9/16/95	OP	Opposes completion of Route 710 Freeway extension and favors Multi-Mode/Low Build proposal.	Comment considered during the decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-178	M. Darcy Williams	9/18/95	OP	Opposes completion of Route 710 Freeway extension and favors Multi-Mode/Low Build proposal.	Comment considered during the decision making process.
V-179	Kenneth I. Sidle	9/19/95	OP	Opposes completion of Route 710 Freeway extension and favors Multi-Mode/Low Build proposal.	Comment considered during the decision making process.
V-180	Wu H. and Alice Liu	9/19/95	OP	Opposes completion of Route 710 Freeway extension and favors Multi-Mode/Low Build proposal.	Comment considered during the decision making process.
V-181	Syed Ahmed	9/19/95	OP	Opposes completion of Route 710 Freeway extension and favors Multi-Mode/Low Build proposal.	Comment considered during the decision making process.
V-182	Stuart and Stephani Denher	9/21/95	OP	Opposes completion of Route 710 Freeway extension and favors Multi-Mode/Low Build proposal.	Comment considered during the decision making process.
V-183	Thomas Keiser	11/27/95	OP ALT CIR	Urges FHWA to extend Route 710 Freeway extension to Huntington Drive now regardless of decision on proposed project to reduce traffic congestion in Alhambra.	Caltrans has evaluated numerous partial completion proposals (including the Multi-Mode/Low Build proposal which includes the extension of Route 710 to Huntington Drive). These partial build proposals will not fulfill the purpose and need for the project, and will result in more severe air quality impacts than the Build Alternative.
V-184	Christine Tzeng	1/3/96	OP	Opposes completion of Route 710 Freeway extension and favors Multi-Mode/Low Build proposal.	Comment considered during the decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-185	Ana M. Storey	1/8/96	OP	Opposes completion of Route 710 Freeway extension and favors alternative modes of transportation to reduce gridlock, pollution, and environmental degradation.	Comment considered during the decision making process.
V-186	Patricia Pierce	1/14/96	OP	Opposes completion of Route 710 Freeway extension and favors Multi-Mode/Low Build proposal.	Comment considered during the decision making process.
V-187	Douglas C. Barker	1/25/96	OP	Opposes completion of Route 710 Freeway extension because of fiscal, environmental, and cultural impacts and favors low build proposal.	Comment considered during the decision making process.
V-188	Beatrice Siev	2/12/96	OP	Urges Caltrans to complete a supplemental EIS/EIR for the new Route 710 alignment, and perform an unbiased evaluation of Multi-Mode/Low Build proposal.	Please refer to Responses to Comments Nos. V-23 and V-115.
V-189	Glenn A. Cato	2/12/96	OP	Urges FHWA to sign the ROD to complete Route 710 Freeway extension which will reduce traffic congestion through southwest Pasadena.	Comment considered during the decision making process.
V-190	Ron Dava	2/14/96	OP	Strongly supports completion of Route 710 Freeway gap closure project.	Comment considered during the decision making process.
V-191	Robert and Miriam Freeborn	2/16/96	OP	Supports completion of Route 710 Freeway gap closure project and urges FHWA to issue ROD.	Comment considered during the decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-192	Thomas H. Jenkins	2/19/96	OP	Supports completion of Route 710 Freeway gap closure project.	Comment considered during the decision making process.
V-193	James Sullivan	2/20/96	OP	Opposes completion of Route 710 Freeway gap closure project.	Comment considered during the decision making process.
V-194	Fourth Grade Student (name cut off of letter)	2/27/96	OP	Strongly supports completion of Route 710 Freeway gap closure project to reduce traffic congestion on surface streets.	Comment considered during the decision making process.
V-195	Ed Pittroff	3/13/96	OP	Strongly supports completion of Route 710 Freeway gap closure project to reduce air pollution and increase safety on streets.	Comment considered during the decision making process.
V-196	Glenn S. McWilliams	3/23/96	OP	Strongly supports completion of Route 710 Freeway gap closure project to reduce traffic congestion on surface streets.	Comment considered during the decision making process.
V-197	Rick Gough	4/18/96	OP	Opposes completion of Route 710 Freeway gap closure project, and urges FHWA to complete a supplemental EIS/EIR because of changes in key issues.	See Response to Comment V-115.
V-198	Dee Cody	8/28/96	OP	Opposes completion of Route 710 Freeway gap closure project because of impacts to circulation, public health, historical neighborhoods.	Comment considered during the decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-199	Nolan M. Lam	12/5/96	OP	Pursuant to the California Public Records Act, request copies of all letters, reports, memos, notes, maps and computer print-outs pertaining to Table 11-1 of the FEIS and: (1) right-of-way costs estimates for the Meridian Variation alignment; (2) appraisals supporting the ROW cost estimates of the Meridian Variation alignment; (3) ROW cost estimates for the alternative alignments; and (4) appraisals supporting the ROW cost estimates of the alternative alignments of Route 710.	FHWA has responded to this Freedom of Information Act request.
V-200	Council on Environmental Quality	11/14/97	C/N	Restates the procedures for completing the referral process previously agreed to by the CEQ, FHWA and ACHP.	Comment considered during the decision making process.
V-201	State Senator Adam B. Schiff, 21st District	10/10/97	C/N	Requests a time extension for review of the proposed ROD and provision of a public hearing prior to any decision on the ROD.	A time extension was granted. Please refer to the FEIS, ROD, and the Environmental Reevaluation (April, 1998) for information on the opportunities for public hearings and comments on this project.
V-202	Southern California Association of Governments	10/9/97	C/N	Expresses support for the completion of the proposed project and willingness to participate in the Interim Project proposed in the ROD.	Comment considered during the decision making process.
V-203 - V-206	None	None		There is a gap in Volume V comment numbering from V-203 and V-206.	
V-207	City of Pasadena	9/22/97	OP	Thanks FHWA Administrator for their participation in environmental process for the proposed project.	Comment considered during the decision making process.



<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-208	City of Alhambra	10/8/97	C/N	Pleased with the imminent completion of the ROD for the SR-710 gap closure project.	Comment considered during the decision making process.
V-209	City of Alhambra	10/8/97	C/N	Regarding the pre-Record of Decision document, concerned that the future reevaluation addressing project purpose and need called for in the ROD do not prevent timely implementation of the project. Since this issue has been discussed for years, the City will not support reopening the issue of purpose and need.	Please refer to the Environmental Reevaluation (April, 1998) for a discussion on the purpose and need for the proposed project.
V-210	City of Alhambra	10/8/97	FU	Requests schedule for preparation of a Financial Plan.	Please refer to the conditions set forth on the ROD.
V-211	City of Alhambra	10/8/97	II	Expressed opposition to the extension of the freeway to Mission Road as outlined in the Interim Improvements, identified in the ROD, since the majority of the vehicles at this terminus will impact local streets in the City. In addition, the City requests FHWA/Caltrans commit to a performance schedule setting time limits for accomplishment of each task outlined in the ROD.	Please refer to the conditions set forth on the ROD.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-212	City of Pasadena	10/9/97	C/N	Expresses strong support for the project and the conditions laid forth in the pre-ROD. Requests clarifications of the following points: 1) identification of time limits on all steps; 2) clarify additional funding for interim improvements; 3) clarify the role cities will play in selection members of the advisory group; 4) clarify the extent of reevaluation, set forth in Condition 4.a, particularly that a new EIS is not envisioned; and 5) ensure maintenance of buildings during the interim period. Also reiterated understanding that interim improvements identified in the pre-ROD are only suggestive and can be modified and that City does not support phasing of the freeway improvements.	Comment considered during the decision making process. Please refer to the conditions set forth in the ROD. Specific details will be worked out during final design.
V-213	City of San Gabriel	10/9/97	C/N	States that conditions outlined in the pre-Record of Decision are acceptable to the City and expressed support for the proposed project.	Comment considered during the decision making process.
V-214	City of South Pasadena	10/9/97	C/N	Requests extension of the review deadline for the pre-ROD.	Extension was granted.
V-215	City of Monrovia	10/13/97	C/N	States that conditions outlined in the pre-Record of Decision are acceptable to the City and expressed support for the proposed project.	Comment considered during the decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-216	City of Monterey Park	10/22/97	C/N	States that conditions outlined in the pre-Record of Decision are acceptable to the City and expressed support for the proposed project.	Comment considered during the decision making process.
V-217	South Pasadena Unified School District	10/15/97	PS	Freeway will have physical and fiscal effects on the District and requests that the ROD not be signed until all mitigation is agreed upon by affected agencies.	Comment considered during the decision making process. Please refer to responses to comments V-218 and 219.
V-218	South Pasadena Unified School District	10/15/97	PS	Freeway will negatively effect the District's operating budget through reduction in average daily attendance (ADA) funding.	The issue of fiscal and other impacts to school districts was thoroughly addressed during the Advisory Committee process. Please refer to the Advisory Committee's Final Report (June, 1993) for the school impact analysis discussion. The affect of the passage of Proposition 13 on school financing is explained. Caltrans incorporated all of the Advisory Committee's recommended mitigation measures fro school impacts except the recommendation to reimburse school districts for lost ADA funds due to loss of pupils. The reason for not adopting this recommendation is lack of Legislative direction. It was fully acknowledge by all participants in the advisory Committee process that the current Education Code Statutes, Article 16: Sections 41960 - 41964, governing severance aid to school districts are no longer relevant in a post Proposition 13 world. Because of this fact, Caltrans has committed to aid school districts to have the State Legislature revise this statute.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-219	South Pasadena Unified School District	10/15/97	PS	Proposed freeway and associated cut and cover tunnel will negatively affect noise and air quality levels and stadium access. Requests that ends of tunnel are located north and south of the school's athletic fields. In addition, cover could be used for recreational resources.	Comment will be referred to the Design Advisory Group to be considered during final design.
V-220	Citizens United to Save South Pasadena	9/16/97	AL	Expresses support for the Multi-Mode/Low Build proposal.	Comment considered during the decision making process.
V-221/222	No 710 - Neighbors Opposed to the 710 Freeway	9/17/97	AL	Expresses support for the Multi-Mode/Low Build proposal.	Comment considered during the decision making process.
V-223	Infrastructure Advisory Committee, American Society of Civil Engineers-Los Angeles Section	9/24/97	AL	Supports the "Compromise Route"	Please refer to response to comment V-37.
V-224/225	Alhambra for Traffic Solutions	9/26/97	AL	Expresses support for the Multi-Mode/Low Build proposal.	Comment considered during the decision making process.
V-226	Pasadena Heritage	9/26/97	OP	Expresses opposition to the proposed project and support for the Multi-Mode/Low Build proposal.	Comment considered during the decision making process.
V-227	The 710 Opposition Coalition	9/28/97	OP	Expresses opposition to the proposed project and support for the Multi-Mode/Low Build proposal.	Comment considered during the decision making process.
V-228	Westridge School	10/1/97	OP	Expresses opposition to the proposed project and support for the Multi-Mode/Low Build proposal.	Comment considered during the decision making process.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
V-229	Angeles Chapter, Sierra Club	10/3/97	TR	Asserts that new highway capacity increases traffic and does not relieve congestion. Thus, the purpose and need for the proposed freeway is flawed.	<p>The fact is that growth is going to take place whether the Route 710 gap closure is implemented or not. The SCAG region is projected to grow by 6 million people to a population of 20 million by the year 2020, according to SCAG's Regional Comprehensive Plan and Guide (RCPG). The Route 710 gap closure project would accommodate growth by adding capacity and allowing for a more efficient operation of the regional freeway system. Please refer to Chapter VIII of the FEIS for a discussion on growth inducing impacts. The RCPG is in full agreement with the conclusions reached in the FEIS.</p> <p>Actually, because of better emissions controls, more recent air quality models show reduced pollutant emissions for transportation projects. However, updated model results have been included in the Environmental Reevaluation (April, 1998).</p>
V-230	Angeles Chapter, Sierra Club	10/9/97	AQ	Asserts that air pollution would worsen rather than improve, since new highway capacity increases traffic and does not relieve congestion.	Please refer to Response to Comment V-229.
V-231	Angeles Chapter, Sierra Club	10/9/97	SE	Cost/benefit analysis is flawed since the benefits it claims do not exist (i.e. reduced congested and time savings) and does not take into account the effect of urban sprawl associated with additional freeway capacity.	The cost benefit analysis performed for this project is one of the most comprehensive ever done for any project. Please refer to the discussion of the model analysis performed by Caltrans provided in the Environmental Reevaluation (April, 1998).

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-232	710 Freeway Coalition	10/13/97	OP	Expresses strong support for the project and the conditions laid forth in the pre-ROD. Requests clarifications of the following points: 1) clarify the issues that the advisory groups will be limited to; 2) clarify additional funding for interim improvements; 3) clarify the extent of reevaluation, set forth in Condition 4.a, particularly that a new EIS is not envisioned 4) identification of time limits on all tasks.	Comment considered during the decision making process. Please refer to the conditions set forth in the ROD. Specific details will be worked out during final design.
V-233	National Trust for Historic Preservation	10/15/97	AL	Requests that the ROD include 1) conditions requiring monitoring of the efficacy of Interim Improvements identified in the pre-ROD to determine whether the need for the freeway project is obviated by these improvements and 2) conditions requiring construction of an integrated set of Interim Improvements, rather than piecemeal implementation by local agencies.	Please refer to the conditions set forth on the ROD.
V-234	National Trust for Historic Preservation	10/15/97	C/N	Future Reevaluation documents, identified in the pre-ROD, much take into consideration the effectiveness of Interim Improvements in reducing the need for the proposed freeway. In addition, the Reevaluation should be circulated by interagency and public comment. A Supplemental EIR/EIS is already required.	Please refer to the Environmental Reevaluation (April, 1998) for an assessment of the potential effect of changed environmental circumstances on the conclusions of the Final EIS.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
V-235	National Trust for Historic Preservation	10/15/97	HB	Concerned with the potential for demolition of structures on existing State properties within the freeway right-of-way and property acquired during the interim period, especially if a nonfreeway alternative is considered viable in the future.	Please refer to the conditions set forth on the ROD.
V-236	National Trust for Historic Preservation	10/15/97	C/N	<p>Asserts that the environmental documentation is legally deficient and referencing prior letter of April 30, 1996 outlining these deficiencies.</p> <p>FHWA has failed to resolve/respond to the interagency dispute between FHWA and DOI and complete the requirements of the CEQ referral.</p>	<p>Please refer to responses to comments LB-166 through 170 in Volume III of the FEIS Response to Comments.</p> <p>In its April 6, 1993, correspondence, the General Counsel stated that the CEQ would not entertain the referral until FHWA, ACHP, and other interested groups had agreed on (1) an inventory of historic resources and (2) a low build proposal. FHWA would then undertake the appropriate analyses, determine what its course of action would be, and notify the ACHP and CEQ. FHWA and Caltrans undertook the requested analyses, and 1) inventoried all historic resources (in a letter of September 30, 1997, ACHP agreed that this inventory was complete) and 2) analyzed South Pasadena's proposal and determined, like other low build analyses, this low build proposal did not meet the purpose and need. FHWA and Caltrans believe that they have fulfilled the requirements of the CEQ referral.</p> <p>Please refer to the Environmental Reevaluation (April, 1998) and the Final Revised Section 4(f) Evaluation for further discussion of this issue.</p>

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
V-237	National Trust for Historic Preservation	10/15/97	OP	Suggests development of a phased decision making process that considers the effect of the Interim Improvements in eliminating the need for the proposed freeway.	Please refer to the conditions agreed in the ROD.
V-238	Citizens United to Save South Pasadena	10/25/97	CIR/AQ /AL	<p>Expresses opposition to the proposed freeway project and disputes the air quality benefits cited in the environmental document, particularly in the case of the City of Alhambra. References Shute, Mihaly &amp; Weinberger letter of June 1, 1994.</p> <p>Traffic impacts within the City of Alhambra are not generated by local commuter trips but rather by local residents accessing commercial development within the City and lack of appropriate arterial improvements.</p> <p>The Multi-Mode/Low Build plan has been analyzed using faulty assumptions and modeling techniques, such as the LARTS model. The LARTS model is a regional model inappropriately applied to this corridor.</p>	<p>The updated Caltrans Air Quality reports of August, 1995, and January, 1996, confirm that the environmental setting remains essentially the same as when the previous environmental document was prepared.</p> <p>The LARTS model takes into consideration both commuter trips and local resident trips to project traffic impacts.</p> <p>The LARTS model used for this study is extensively used by the Southern California Association of Governments. The assumptions used on the model were agreed, in writing, by all parties, including South Pasadena.</p>
V-239	CEHP, consultant to Citizens United to Save South Pasadena	11/13/97	OP	Expresses opposition to the proposed freeway project and transmits 10/25/97 letter from Citizens United to Save South Pasadena.	<p>Comment considered during the decision making process.</p> <p>Also, please refer to responses to comments V-237 and 238</p>



<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-240/V-241	CEHP, consultant to Citizens United to Save South Pasadena	11/13/97	OP	Requests denial of the proposed freeway project and consideration of other alternatives for meeting transportation needs.	A comprehensive analysis performed by Caltrans/FHWA showed the Build Alternative to be more cost-effective than the No Build Alternative and the Multi-Mode/Low Build proposal.
V-242	Friends of the Earth	11/13/97	OP	Expressed opposition to the proposed freeway project.	Comment considered during the decision making process.
V-243	Blair-Martin Co.	11/17/97	OP	Expressed support for the proposed freeway project.	Comment considered during the decision making process.
V-244	Jon W. Crosley	9/17/97	NR	Supports completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-245	Thomas Keiser	9/24/97	AL	Urges consideration of a compromise solution to stalemate over the extension of the Route 710 Freeway Gap.	Comment considered during decision making process.
V-246	Arthur Eggert	9/25/97	NR	Supports completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-247	Carol Hanson	9/25/97	NR	Supports completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-248	William and Margi Denton	9/29/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-249	Derek K. Schubert	9/30/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-250	Raymond Girvigian	10/1/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports a reasonable alternative.	Comment considered during decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-251	Raymond Girvigian	9/15/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-252	Jennifer Vaughn	10/6/97	OP	Opposes completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-253	William J. York, Jr.	10/7/97	OP	Cites that only a bare majority of Pasadena's City Council supports the completion of the 710 Freeway Gap Closure, and recommends that the ROD not be approved.	Comment considered during decision making process.
V-254	David Tull	10/7/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-255	Robert and Miriam Freeborn	10/8/97	NR	Supports completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-256	H. Ross and Mary H. MacMichael	10/9/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-257	Randolph Parks	10/1/97	NR	Supports completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-258	Thomas J. Dolan	10/12/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-259	Jane Rosen	10/13/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-260	Irving and Shelby Rector	10/15/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-261	Patrick Nicholson	10/16/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-262	John Gamon	10/16/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-263	Patricia Churchill	10/17/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-264	Debbi Hoffman	10/21/97	OP	Opposes completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-265	George T. McDonnell	10/22/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-266	Leonard Rusch	10/29/97	OP NR	Opposes completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-267	Leonard Rusch	10/29/97	HB	The proposed freeway route would destroy hundreds of homes and businesses, and devalue the homes and businesses that remain.	Please refer to FEIS and Environmental Reevaluation (April, 1998) for a discussion of housing and business impacts.
V-268	Leonard Rusch	10/29/97	EJ	Specifies concerns of loss to El Sereno and resulting environmental justice issues.	Please refer to Environmental Reevaluation (April, 1998) for a discussion of environmental justice concerns.
V-269	Leonard Rusch	10/29/97	CIR	Proposed freeway would not alleviate Alhambra's traffic congestion.	Traffic studies prepared for the EIS and Environmental Reevaluation (April, 1998) do not support the conclusions of the commentor.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-270	Leonard Rusch	10/29/97	C/N	Underlying justifications for the project are outdated and erroneous, and the EIS is flawed, including inaccurate assessment of historic resources, air quality, and environmental justice.	Traffic studies prepared for the EIS and Environmental Reevaluation (April, 1998) do not support the conclusions of the commentor.
V-271	Leonard Rusch	10/29/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-272	Charles H. Siegel	11/2/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports consideration of other, less drastic alternatives for improving transportation flow through South Pasadena.	Comment considered during decision making process.
V-273	Beatrice Siev	11/2/97	OP	Opposes completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-274	Margery Mackenzie	11/2/97	OP AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-275	Hatsuki Nakagawa	11/3/97	OP	Opposes completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-276	The Risagari-Gai Family	11/3/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-277	Joe Candeias	11/3/97	NR	Supports completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-278	Harry and Doris Scholar	11/3/97	NR	Supports completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-279	Gary Latzko	11/3/97	NR	Supports completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-280	Andrew Rottenbacher	11/3/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-281	Patrice M. Cates	11/4/97	OP	Opposes completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-282	Arthur R. Penrod	11/5/97	NR	Supports completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-283	Joy Peralez	11/5/97	OP	Opposes completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-284	Allan D. Bond	11/7/97	AL OP	Prefers not to continue to debate or fight the completion of Route 710 with taxpayer monies. Supports a compromise solution.	Comment considered during decision making process.
V-285	Gideon L. and Jayne T. Young	11/7/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports consideration of more worthy projects in regards to transportation issues.	Comment considered during decision making process.
V-286	Vincent and Donna Maria O'Conner	11/7/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-287	Darek Lis	11/7/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports consideration of more worthy projects in regards to transportation issues.	A comprehensive analysis performed by Caltrans and FHWA showed the Build Alternative to be more cost-effective than the No Build Alternative and Multi-Mode/Low Build proposal.
V-288	John Gawley	11/7/97	AL	Opposes completion of Route 710 Freeway Gap Closure and requests reconsideration of the Westerly Route.	Comment considered during decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-289	Lynn Paulson	11/8/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-290	Mr. and Mrs. John Elspas	11/8/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-291	Donald and Zolita Rapp	11/9/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports consideration of other more viable alternatives.	Comment considered during decision making process.
V-292	Lenza Salvitti	11/10/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-293	Kathryn "Katie" Nack	11/10/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports consideration of other more viable transit alternatives.	Comment considered during decision making process.
V-294	William J. Bogaard	11/10/97	OP	Opposes completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-295	Richard Worthington	11/10/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports consideration of other more viable transit alternatives.	Comment considered during decision making process.
V-296	Rick Cole	11/10/97	OP	Strongly urges FHWA to seek resolution and make a decision for the Route 710 Freeway Gap Closure project.	Comment considered during decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-297	Jerry P. Schneider	11/10/97	OP C/N AL	Opposes approval of ROD because EIS is flawed in that it did not adequately address alternatives to the project. Requests that Multi-Mode/Low Build proposal and No Build Alternative be fully explored.	Comment considered during decision making process. Please refer to the Environmental Reevaluation (April, 1998) for a discussion of the analysis conducted for these alternatives.
V-298	Michelle Gringeri-Brown and James Scott Brown	11/11/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-299	The Au's Family	11/11/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-300	Larry Goren	11/11/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports the Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-301	Ite A. Laird-Offringa	11/12/97	OP	Opposes completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-302	Reverend Sarah Belknap	11/12/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports consideration of other more viable transit alternatives.	Comment considered during decision making process.
V-303	Antonio Rossmann	11/13/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports consideration of other more viable transit alternatives.	Comment considered during decision making process.
V-304	Douglas Haxall	11/13/97	AL	Opposes completion of Route 710 Freeway Gap Closure and supports consideration of other more viable transit alternatives.	Comment considered during decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-305	John Zaycher	11/14/97	OP	Opposes completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-306	Bill Haas	11/14/97	OP	Opposes completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-307	Andrew and Karin Elliott-Chandler	11/16/97	AL	Opposes approval of ROD and supports consideration of other more viable transit alternatives.	Comment considered during decision making process.
V-308	James D. Goltz	11/30/97	AL CH	Opposes completion of Route 710 Freeway Gap Closure because of the destruction to historical resources.	Comment considered during decision making process.
V-309	The Whitehead Family	Not dated	NR	Supports completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.



Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
V-310	Deanna Wieman, U.S. EPA, Region 9	1/6/95	AQ	FHWA should prepared a conformity determination conducted in accordance with the applicable criteria set forth in the regulations (§176, Clean Air Act; §93.102(c)(1) of NEPA), including currently conforming transportation plan and TIP. In addition, project must meet existing carbon monoxide (CO) and particulate matter less than 10 microns (PM <sub>10</sub> ) emission standards. FHWA must provide an opportunity for consultation by interested agencies and comments from the public pursuant to §§93.112 and 93.105)(a)(2) and (e).	<p>Please refer to the Environmental Reevaluation (April, 1998) for a detailed discussion of air quality conformity issues.</p> <p>The FHWA and the Federal Transit Administration (FTA) made a joint conformity determination on the Southern California Association of Governments' (SCAG) 1996/97 to 2002/03 Regional Transportation Improvement Program (RTIP) and the 1994 Regional Mobility Element (RME). In making the conformity determination, the FHWA and FTA, in consultation with the United States Environmental Protection Agency (USEPA), determined that SCAG's long-range transportation plan and transportation improvement program are in conformance with the adopted State Implementation Plan (SIP), and that priority has been given to the timely implementation of transportation control measures contained in the SIP in accordance with 40 CFR Part 51. The proposed Route 710 project is identified in the adopted and conforming 1994 RME and the 1996/97 to 2002/03 RTIP.</p> <p>The project level carbon monoxide analysis has been updated using the most recent USEPA approved emissions model. The results of this project level carbon monoxide analysis were coordinated with various involved entities, including USEPA. The results of the updated project level carbon monoxide analysis show that the Route 710 project will not create any new carbon monoxide violations, and will reduce the frequency and severity of existing carbon monoxide violations.</p>

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-311	Deanna Wieman, U.S. EPA Region 9	1/6/95	C/N	Project must incorporate appropriate pollution prevention principles and mechanisms in their planning and decision making under NEPA.	Appropriate pollution prevention principles and mechanisms and the inclusion of Best Management Practices are fully integrated into the federal aid highway program. All plans and specifications for construction of any portion of the project will fully reflect all measures to prevent pollution during construction and future operations of the facility. Also, construction activities, which will implement the specifications setting forth pollution prevention plans and measures, will be under the full oversight of Caltrans. In summary, FHWA will ensure that appropriate pollution prevention principles and mechanisms will be implemented on this project.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
V-312	Deanna Wieman, U.S. EPA Region 9	1/6/95	EJ	The reevaluation of the proposed project should consider and reflect requirements of Executive Order 12898, regarding federal action to address Environmental Justice issues.	<p>Please refer to the Environmental Reevaluation (April, 1998) for a detailed discussion of environmental justice issues.</p> <p>The mitigation of adverse economic, social, and environmental effects relating to implementing the proposed project has been a major focus of FHWA's efforts since 1993. As part of these efforts, and in accordance with Executive Order 12898 and Title VI of the 1964 Civil Rights Act, FHWA has paid particular attention to whether the proposed project might result in any disproportionately high and adverse human health or environmental effects on minority or low income populations. After reviewing the history of the project, FHWA concluded that all decisions and policies with regard to the project have been made and administered based upon neutral and objective evaluations. Nevertheless, as a result of community input and further preliminary evaluations, FHWA required additional mitigation on the basis of the specific impacts of the project. Thus, design was modified to depress the entire freeway below grade level in the residential areas of El Sereno. This enables FHWA/Caltrans to provide one additional cut and cover tunnel in the El Sereno neighborhood to minimize community disruption.</p>

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
V-313	Deanna Wieman, U.S. EPA Region 9	1/6/95	AL	During reevaluation of a Multi-Mode/Low Build proposal, need to also evaluate whether this alternative raises significant new circumstances or information relevant to environmental concerns or its impacts, which would require a Supplemental Draft Environmental Impact Statement (SDEIS).	<p>Additional mitigation features will also be considered as the design is developed. Community design advisory groups will be established in each area through which the proposed project would pass to ensure full community input into these decisions. The changes already incorporated since the FEIS will add an estimated cost of \$100 million to the project.</p> <p>Please refer to the Environmental Reevaluation (April, 1998) for a detailed discussion of the Multi-Mode/Low Build proposal.</p> <p>To ensure that the Multi-Mode/Low Build proposal received a final comprehensive analysis, FHWA directed Caltrans to model the low build plan, the No Build Alternative, and the Build Alternative using the most current practical techniques available. To start this process, SCAG coordinated a meeting with interested parties to define the “multi-mode/low build” and develop the general input parameters and assumptions for modeling. The results of this effort are reflected in the “State Route 710, A Model Evaluation of the City of South Pasadena’s Multi-Mode Low Build Proposal (April, 1996).” As with other low build plans that had been previously considered, the latest proposal did not meet the project’s purpose and need. Therefore, it was not necessary to subject this proposal to further environmental evaluation.</p> <p>Also, please refer to Response to Comment V-314.</p>

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
V-314	Felicia Marcus, U.S. EPA Region 9	3/4/98	C/N	A SDEIS needs to be prepared.	23 CFR 771.130(b) (1) states that a Supplemental EIS will not be necessary where the changes to the proposed action, new information or new circumstances result in a lessening of adverse environmental impacts, which is the situation for this project. FHWA has determined that the changes to the proposed project result in a lessening of adverse environmental impacts.
			C/N PP	The project changes that are being considered have not been fully disclosed to the public	FHWA and Caltrans have provided copies of approved documentation and reports to all interested parties upon request, and have hosted a number of meetings and outreach efforts.
V-315	Felicia Marcus, U.S. EPA Region 9	3/4/98	CEQ AL C/N	We are concerned that FHWA's analysis of South Pasadena's Multi-Mode/Low Build proposal has not met CEQ's recommendation that one technically feasible Multi-Mode/Low Build option be examined and given consideration as a proposal for the proposed action.	In a transmittal to the ACHP and FHWA dated April 6, 1993, the General Counsel stated that the CEQ would not entertain the referral until FHWA, ACHP, and other interested groups had agreed on (1) an inventory of historic resources and (2) a low build proposal. FHWA would then undertake the appropriate analyses, determine what its course of action would be, and notify the ACHP and CEQ. FHWA and Caltrans undertook the analysis requested, and determined that South Pasadena's proposal, like other low build analyses, does not meet the purpose and need.
			PN	None of the criteria were part of the purpose and need statement contained in the 1992 FEIS.	Since the FEIS, the purpose and need of the project have been refined slightly. Please refer to the Environmental Reevaluation (April, 1998) for a further discussion of historic issues.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
			C/N AL	Caltrans and FHWA did not find merit in proposing modifications to South Pasadena's proposal that would establish what both agencies could consider a technically feasible Multi-Mode/Low Build proposal.	<p>On October 18, 1995, a Modeling Review for the Multi-Mode/Low Build proposal was held at the SCAG offices in Los Angeles. The meeting was attended by interested parties, including representatives from the cities of South Pasadena, Pasadena, Alhambra, and Los Angeles, Los Angeles DOT, LA County Public Works, LACMTA, FHWA, Caltrans, Natural Resources Defense Counsel (NRDC), and South Pasadena's consultants (G.J.K.A.R., Inc. and Kimley-Horn). The Multi-Mode/Low Build proposal was defined and general input parameters and assumptions for modeling were agreed upon by all in attendance.</p> <p>No modifications of South Pasadena's proposal were analyzed at this time, but other Multi-Mode/Low Build proposals have been analyzed that have not met the purpose and need.</p>

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
V-316	Felicia Marcus, U.S. EPA Region 9	3/4/98	AL C/N	FHWA implies that the low build proposal would in some cases have a lower performance than the no build proposal.	The implication that the Multi-Mode/Low Build proposal would in some cases have a lower performance than the No Build Alternative is based in the results of the LARTS models. The parameters used as input were agreed upon by all parties. Please refer to the report "A Model Evaluation of the City of South Pasadena's Multi-Mode Low Build Proposal" and to Response to Comment V-315.
			PD CIR	The model was not run repeatedly to refine the analysis.	The LARTS model (a planning model) was used for the analysis. "Simulation" models, on the other hand, are typically run repeatedly to further refine the analysis. LARTS is not a simulation model. Nevertheless, additional work was done to refine the analysis and improve the accuracy of the results.
			C/N OP	The report did not clearly disclose all of the proposal's elements.	Please refer to Response to Comment V-315 and to the report "A Model Evaluation of the City of South Pasadena's Multi-Mode Low Build Proposal."
			CIR OP	The report disclosed nothing about the vehicle capacity and volumes on local streets.	Please refer to pages 28 thru 36 of the report "A Model Evaluation of the City of South Pasadena's Multi-Mode Low Build Proposal"

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V-317	Felicia Marcus, U.S. EPA Region 9	3/4/98	C/N AL	The Multi-Mode/Low Build proposal has not been afforded consideration on par with the other proposals.	An extensive and detailed cost analysis of the Multi-Mode/Low Build proposal versus the No Build and Build Alternatives was performed. Please refer to the report "A Model Evaluation of the City of South Pasadena's Multi-Mode/Low Build Proposal" and the discussion in the Environmental Reevaluation (April, 1998)
V-318	Felicia Marcus, U.S. EPA Region 9	3/4/98	II M/M	Any mitigation measures or interim improvements that FHWA has not analyzed as part of the preferred proposal should be evaluated in a new SDEIS.	Please refer to Response to Comment V-314.
V-319	Felicia Marcus, U.S. EPA Region 9	3/4/98	OP	We agree that the proposal is different from the 1992 FEIS. Absent any other issues, that "fundamental difference" supports the preparation of a SDEIS.	Please refer to Response to Comment V-314.
V-320	Felicia Marcus, U.S. EPA Region 9	3/4/98	AL GEO	We are concerned that one of the tunnels may not be technically feasible. We strongly believe that FHWA should know now, with far greater certainty, whether or not a cut and cover tunnel is going to be feasible.	A detailed analysis of this issue will be undertaken as part of the final design.
V-321	Felicia Marcus, U.S. EPA Region 9	3/4/98	AL OB	The SDEIS should provide an evaluation of a technically feasible Multi-Mode/Low Build proposal.	Please refer to Responses to Comments V-314 and V-315.



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V-322	Felicia Marcus, U.S. EPA Region 9	3/4/98	PN	FHWA should revisit the purpose and need for the project.	The purpose and need have been refined. Please refer to Response to Comment V-315.
V-323	Felicia Marcus, U.S. EPA Region 9	3/4/98	GEO CON	The SDEIS should discuss the direct and indirect impacts from the construction and operation of the four to five additional cut and cover tunnels, removal of historic properties.....	Please refer to Response to Comment V-314. A more detailed analysis of impacts on the cut and cover tunnels will be performed as part of final design. Please refer to the Environmental Reevaluation (April, 1998) and Final Revised Section 4(f) Evaluation for discussion of historic properties.
V-324	Felicia Marcus, U.S. EPA Region 9	3/4/98	C/N	FHWA should seriously consider producing a SDEIS.	See Response to Comment V-314.
V-325	Advisory Council on Historic Preservation	12/30/97	CH	Acknowledges FHWA has prepared a complete and adequate inventory of all historic properties.	Concurrence on the historic property inventory is acknowledged.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
V-326	Advisory Council on Historic Preservation	12/30/97	CH	Questions impact on the integrity of historic districts during and after construction of cut and cover tunnels	FHWA recognizes the concern that the mitigation proposal of cut and cover tunnels does not include extensive detail. The proposal for cut and cover tunnels and rehabilitation of historic buildings is for the purpose of preserving neighborhood integrity and cohesion as well as mitigating impacts to historic districts as proposed by the National Trust. Use of cut and cover tunnels has been successfully applied at several locations throughout the country. Preserving and relocating historic structures have likewise been successfully accomplished elsewhere, although not in conjunction with cut and cover tunnels. Given the high demand for housing in the State Route 710 corridor, and the improved livability of the rehabilitated houses, we believe all housing in the corridor will be highly marketable, thereby contributing to neighborhood integrity and cohesion and helping to retain the viability of the historic districts.

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					<p>The concept of cut and cover tunnels as a method of mitigation for neighborhood cohesion is the subject of several studies by the FHWA currently being published. One such example involved the creation of a park and walkways over I-696 in Oak Park, Michigan, to maintain a connection between the residential portion of an Orthodox Jewish community and its cultural, religious, and commercial facilities. Despite temporary construction impacts, the community remained cohesive and, in fact, continues to thrive. In Duluth, Minnesota, a tunnel was employed to enhance the City's waterfront and protect critical historic structures. In Seattle, Washington, a linear park was created over a cut and cover tunnel to connect neighborhoods and provide access to a bikeway. The I-10 Papago Freeway in Phoenix, Arizona, employed many of the mitigation features proposed for State Route 710. In each of these cases, the cut and cover feature, combined with careful, responsive design, led to success in maintaining neighborhood cohesion and integrity.</p> <p>By providing natural cover to support compatible landscapes and restore communities to original settings, the State Route 710 cut and cover concept is maximizing a technique to preserve existing land uses, thereby further assuring neighborhood compatibility and cohesion. Also, this feature minimizes proximity impacts to adjacent properties.</p>

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
					<p>Street closings and loss of natural trees and vegetation will have a temporary adverse effect on communities, but experience has shown these impacts will not reduce the long-term qualities of the historic properties. To lessen the temporary impacts, the corridor will be professionally landscaped, with as many trees replaced as removed. Concerning revegetation of the cut and cover tunnels, depth of earth cover over the tunnel caps will be sufficient to support a wide variety of trees and bushes. Initially, Pasadena Avenue and Markham Place, with two to five foot depths of cover, would require special treatment. Currently, designers believe they will be able to improve these cover depths to eight feet or more, allowing most tree species to be replicated. All other locations should be less challenging, with 5 to 35 foot covers.</p> <p>Similarly, street closures can be mitigated during design to restore or even enhance current neighborhood conditions, especially with the freeway depressed. For example, arterials serving the neighborhoods will generally have less traffic. Also, more cul-de-sac street layouts could be employed to reduce through trips, subject to DAG determinations. Finally, with a depressed freeway, practically any street can be fully restored if desirable to improve neighborhood traffic circulation. The detailed decisions concerning landscaping, noise walls, street layout, and traffic circulation must await final design. However, FHWA is convinced that working through the DAGs will allow the design teams to adequately address every major issue.</p>

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
V-327	Advisory Council on Historic Preservation	12/30/97	CH	Questions conclusions regarding the viability of the low build proposal, particularly since several of the components of the Multi-Mode/Low Build proposal are considered as interim improvements. Requests further analysis of the low build proposal.	<p>Construction disruption will, of course, result in unavoidable adverse impacts. However, the disruption and its effects are temporary. Moreover, measures have been identified to mitigate construction impacts on air, noise, traffic, and water runoff. Effective control measures are a part of city ordinances and State specifications, and are administered by the cities working with Caltrans and its contractors. Also, FHWA encourages fast-track construction techniques to speed construction completion times. FHWA believes the DAGs can also be especially helpful in this regard. Community ombudsmen successfully fulfilled a similar role in I-696 in Michigan.</p> <p>A variety of “Low Build” options have been tested over the years, including the most recent option developed in close coordination with the City of South Pasadena in support of CEQ’s charge. Despite numerous iterations, a “Low Build” proposal that meets purpose and need by improving regional and corridor traffic flow is not available and, based on the analysis, is not attainable given the traffic demands on the corridor. The Multi-Mode/Low Build options simply do not work. Furthermore, there is no substantive basis for the “No Build” position proposed in the Staff Analysis.</p>

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
					<p>The ACHP Staff Analysis raises the point that FHWA's determination that the Multi-Mode/Low Build proposal does not meet the purpose and need is not universally accepted. Although some may never accept our determination, we note the Multi-Mode/Low Build proposal was defined with input and acceptance of the City of South Pasadena's consultants and was analyzed using the most sophisticated professional techniques available. At your behest, the FHWA reassessed the conclusion based on comments received, assigning our top traffic modeling experts to this effort. These nationally recognized experts, supported by Caltrans and the Southern California Association of Governments (SCAG), continue to conclude the "low build" does not meet the project's purpose and need and in many respects is less desirable than the "no build." Further discussion of this issue is provided in the Environmental Reevaluation (April, 1998).</p>

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
					<p>A variety of “low build” concepts have now been assessed, all with the same conclusion, namely that the Multi-Mode/Low Build proposal does not meet the purpose and need. Thus, as a result, comments such as “traffic calming on arterials distorts performance” fail to recognize that traffic calming on these arterial was intended by the Multi-Mode/Low Build proponents and does not change the basic conclusion. Similarly, comments indicating that there is little difference in hours saved by the build alternative are simply incorrect. This project would have extremely significant effects on transportation operations both in the corridor and on parallel freeways. Indeed, it should be recognized that the daily vehicle hours of travel values shown in the Model Evaluation Report represent travel in the entire six county area.</p> <p>Thus, although the percentage of vehicle hours saved is small, the absolute value is extremely significant in terms of the total region. The FHWA, Caltrans, and SCAG are convinced our analysis is conclusive that a Multi-Mode/Low Build proposal will not meet the purpose and need. Further efforts at refinement would be unfruitful and detract from our efforts to improve project mitigation and involvement. Only the Build Alternative alleviates congestion on the regional freeway systems and the corridor arterial system while improving overall high occupancy vehicle (HOV) operations.</p>

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
					<p>The concept of building State Route 710 on the south end to Mission Road as an interim measure to test the Multi-Mode/Low Build proposal was considered and rejected for a variety of reasons. Most important, it introduced substantial additional traffic to the corridor (between 8,000 and 9,000 vehicles per day). Much of that traffic would exit onto Mission Road in the El Sereno neighborhood, overloading residential streets. Although traffic controls could channel some of the flow, they would not alleviate all problems. As a result, the concept was opposed by the cities of Los Angeles and Alhambra. Given these issues and concerns, none of the governmental agencies involved, except the City of South Pasadena, believes this is a viable action.</p> <p>The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) encourages decision making by State transportation departments and metropolitan planning organizations with regard to transportation plans and programs. The proposed project is supported by Caltrans, SCAG, and all local units of government, except South Pasadena. Also, ISTEA encourages HOV facilities, which this project would provide, to increase carpools and bus usage. As shown by the traffic analyses of alternatives, the proposed HOV lanes are a critical part of the area's HOV system, significantly increasing carpool and bus use.</p>
V-328	Advisory Council on Historic Preservation	12/30/97	CH	Acknowledges that impacts to historic resources is reduced from the Final EIS.	Concurrence on the reduction in historic properties affected is acknowledged.



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V-329	Advisory Council on Historic Preservation	12/30/97	CH	Concerned that impact analysis does not address the long-term effect of construction on the integrity of the historic districts, including relocation of structures, street closings, loss of mature trees and vegetation and community disruption.	Project mitigation is vastly superior to that proposed in the 1992 FEIS, and incorporates every practical measure to minimize harm to historic resources and the affected communities. Given this unprecedented level of mitigation, FHWA concluded that the project does not contain impacts of national significance or sensitivity to warrant a referral to CEQ.
V-330	Advisory Council on Historic Preservation	12/30/97	CH	Concerned regarding the long-term viability and integrity of historic districts.	Please refer to Response to Comment V-329.
V-331	Advisory Council on Historic Preservation	12/30/97	CH	Questions technological feasibility of removal and relocation of structures on the cut and cover tunnels and desirability of the area on top of the tunnel. Negative environmental effects will diminish the quality of the historic district.	Please refer to Response to Comment V-329.  Maintaining and protecting properties stored for reconstruction on cut and cover tunnels is listed as an impact issue. Although expensive, this issue is manageable. The cost would not be a significant part of the project cost. Also, the proposed project is a candidate for the latest construction and contract administration techniques to minimize construction duration. This would allow a faster restoration period and, consequently, a lesser storage time. Storage and relocation of historic structures has been done throughout the country as an effective mitigation measure. In fact, Caltrans has probably employed this technique more than anyone else. A detailed preservation plan addressing staging and security will be developed during the design phase of this project.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
V-332	Advisory Council on Historic Preservation	12/30/97	CH	Questions adequacy of determinations of effect.	<p>FHWA does not believe temporarily severing historic districts will have a long-term serious effect on their economic and social stability. The quality of these neighborhoods, and the extraordinary mitigation efforts to be employed, should continue to enhance neighborhood desirability, thereby ensuring continued viability. With relocation assistance being provided to dislocated owners, renters, and re-renters of State owned property in the corridor, demand for replacement housing should be substantially higher than at present. Property over cut and cover tunnels should, after construction and mitigation, be just as viable as property over bored tunnels. There are numerous examples of land reuse over tunnels to support an optimistic result (the Washington Mall, Washington Metro, historic Williamsburg, and Gracey Mansion, to name but a few). Because air rights would be returned to the residents, the neighborhood should return to normal after construction.</p> <p>The Staff Analysis Paper expresses concern about the variety and “subtlety” of effects. The FHWA has relied on the ACHP’s adverse effect criteria and has proposed all practical mitigation for all impacts. In addition, we have continued to coordinate with the SHPO and the ACHP regarding identification of additional mitigation measures. We believe using the most sophisticated mitigation measures in conjunction with continuous involvement by the community DAGs minimizes the likelihood of failure. Also, an Environmental Reevaluation near design completion allows all parties to evaluate any changed conditions.</p>

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
					<p>Because we agreed that impacts within an historic district may have cumulative effects, we have addressed them to the extent feasible. Of the 12 historic districts identified in the project corridor, all but 4 have been avoided. Proximity impacts have been minimized by freeway depression, cut and cover tunnels, and corridor landscaping and urban design. Both the direct and proximity effects on these resources are described in the Environmental Reevaluation (April, 1998).</p> <p>As previously discussed, FHWA has agreed to accept the ACHP's determination of effect on properties near the freeway. Extensive mitigation measures have been planned for the historic districts in particular and the overall corridor in general, including design and alignment modifications, cut and cover tunnels, compatible soundwalls or berms, extensive landscaping, and many other urban design measures. Depressing the freeway should do much to reduce any proximity impacts. FHWA does not know what additional measures would be available, but welcomes input and active involvement with the DAGs during design and construction.</p>
V-333	Advisory Council on Historic Preservation	12/30/97	CH	Questions maintenance and protection of removed buildings prior to placement on the cut and cover tunnels.	Please refer to Response to Comment V-331.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-334	Advisory Council on Historic Preservation	12/30/97	CH	States that although impacts have been reduced, substantial impacts remain as a result of the proposed project. Requests that a SDEIS be prepared to further analysis of potential effects on the long-term viability and integrity of the historic districts.	Please refer to Responses to Comments V-326, V-328, V-329, V-331, and V-332. Also, please refer to the Environmental Reevaluation (April, 1998) for a discussion on the impacts of the Build Alternative on historic properties.
V-335	Advisory Council on Historic Preservation	12/30/97	CH	Believes that ISTEA and 1992 NHPA amendments, both references in the 1993 referral, still support continued referral by ACHP.	Please refer to Response to Comment V-328.
V-336	Advisory Council on Historic Preservation	12/30/97	CH	States that the assessment of effects of the proposed project on the long-term integrity of the historic districts does not include accepted adverse effect criteria.	Please refer to Response to Comment V-333.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
V-337	Advisory Council on Historic Preservation	12/30/97	CH	Dispute resolution of unresolved issues should be facilitated by professional mediators and non-highway institutions, particularly regarding the need for the freeway at all.	A process was established to consider mitigation measures as part of our decision making on the proposed project, and has provided for additional community involvement in the future. The Mitigation Advisory Committee established in 1992 included many elements of dispute resolution, although they were confined to mitigation issues not the decision to build State Route 710. Indeed, the work of that committee resulted in a significant reduction of the width of the facility and a greatly enhanced mitigation plan. Also, in the fall of 1997, FHWA asked for input on the proposal that formed the basis for this project. That input also resulted in major changes in project mitigation. The fact that not all interests are completely satisfied by these efforts does not mean they were unsuccessful. In fact, FHWA believes that efforts to resolve differences have made a much stronger overall project proposal.
V-338	Advisory Council on Historic Preservation	12/30/97	CH	ACHP staff recommend renewal of the referral, since the condition is warranted by the 1993 action still exists.	FHWA believes the process proposed to advance this project major impact mitigation and enhancement measures identified, DAGs established, and completion of design elements with full project reevaluation before construction is most comprehensive and should lead to a continuing assessment of the project need, its sponsors' support, and its ability to be funded.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
					Also, this process should ensure all reasonable mitigation and enhancement measures are identified, incorporated into project design, and ultimately constructed.
					FHWA has made every effort to address the letter and spirit of Section 106 of the Historic Preservation Act despite the fact that the Part 800 consultation process resulted in a "failure to agree." FHWA has provided all practical mitigation and, without commitment to the continuing involvement of all interested parties, has done all that is possible to resolve remaining differences. With these extraordinary efforts, FHWA believes this project's impacts on the historic resources in the area are not of national importance and do not constitute a threat to national historic resources or policies. In fact, FHWA believes they reflect the successful development envisioned by Section 106.
V-339	John Fowler, Advisory Council on Historic Preservation	1/12/98	C/N	Requests extension for ACHP's response on the renewal of the referral of the proposed project to the CEQ.	In a response letter dated January 21, 1998, the Department of Transportation agreed to extension of the ACHP's response to March 16, 1998.
V-340	State Senator Adam B. Schiff, 21st District	1/30/98	LU SE	Expressed concern regarding loss of ADA funds within South Pasadena United School District and opposition to the proposed project.	Please refer to Response to Comment V-218.
V-341	Harvey A. Knapp, South Pasadena City Councilmember	1/5/98	OP	Expressed opposition to the proposed project because of fiscal, environmental, and mobility issues.	Please refer to Responses to Comments V-74, V-231, V-270, V-297, and V-310.
V-342	Marengo Elementary School, South Pasadena	11/15/97	OP	Opposes completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-343	The Renaud-Wright Family Trust	2/19/96	NR	Supports completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-344	Kathryn Fonteno	1/15/96	NR	Supports completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-345	Eric Steen	10/22/96	CH	Requests status of plans for taking or not taking of 909 Lyndon Street, South Pasadena.	A portion of the northeastern edge of the property, approximately 3,800 square feet including construction easements, will be affected. Please refer to the Environmental Reevaluation (April, 1998) for additional discussion of this property.
V-346	Dr. David Senske	12/8/97	OP	Opposes completion of Route 710 Freeway Gap Closure and favors public transportation/rail projects.	Comment considered during decision making process.
V-347	Dr. Kari Magee	12/8/97	OP	Opposes completion of Route 710 Freeway Gap Closure and favors public transportation/rail projects.	Comment considered during decision making process.
V-348	Sally Daynes	1/1/98	OP CH SE HB AL	Opposes completion of Route 710 Freeway Gap Closure because of destruction to 70 buildings in six historic districts and dislocation of people and businesses. Favors Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-349	Richard and Pamela Kaye	12/31/97	OP CH SE HB AL	Opposes completion of Route 710 Freeway Gap Closure because of destruction to 70 buildings in six historic districts and dislocation of people and businesses. Favors Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-350	E.V. Wallis	12/19/97	OP	Opposes completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-351	Randall Lake	12/11/97	OP	Opposes completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-352	Mr. and Mrs. John Elspas	12/16/97	OP AL	Opposes completion of Route 710 Freeway Gap Closure and favors Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-353	Jim Ciha	Not Dated	OP AL	Opposes completion of Route 710 Freeway Gap Closure and favors Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-354	Ann P. Wollen	Not Dated	OP AL	Opposes completion of Route 710 Freeway Gap Closure and favors Multi-Mode/Low Build proposal.	Comment considered during decision making process.
V-355	Constance H. Rathbone	10/16/97	OP	Supports completion of Route 710 Freeway Gap Closure.	Comment considered during decision making process.
V-356	William (Bill) Grimes	10/16/97	OP AL	Opposes completion of Route 710 Freeway Gap Closure and favors non-freeway alternatives.	Comment considered during decision making process.
V-357	Judy Grimes	10/14/97	OP AL	Opposes completion of Route 710 Freeway Gap Closure and favors non-freeway alternatives.	Comment considered during decision making process.



Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
V-358	Cathryn Buford Slater, Advisory Council on Historic Preservation	3/20/98	CH	Proposed project's effect on historic properties will be severe, and damage to these resources is irreparable and cannot be mitigated.	<p>Please refer to Response to Comment V-338 regarding impacts to and mitigation of historic resources. FHWA will continue to work with ACHP to improve the proposed project through final design and commit to the following:</p> <ul style="list-style-type: none"> <li>• Adopt all practicable measures for continuing public information and involvement on the project;</li> <li>• Develop clear controls to ensure that the major design features to lessen impacts will be done;</li> <li>• Provide for independent professional review of landscaping and architectural measures; and</li> <li>• Pursue maximum protection of relocated or replaced historic structures addressing duration of storage, protection measures, and provision of security.</li> </ul>
V-359	Cathryn Buford Slater, Advisory Council on Historic Preservation	3/20/98	CH	Proposed project will affect the integrity and viability of historic districts, both directly and indirectly.	Please refer to Response to Comment V-358.
V-360	Cathryn Buford Slater, Advisory Council on Historic Preservation	3/20/98	CH	Proposed project will remove mature landscaping, which is a critical defining element of the districts. This loss, in addition to the loss of man-made elements such as stone walls, will alter a critical element of the historic landscape.	Please refer to Responses to Comments V-338 and V-358.

<b>Comment No.</b>	<b>Commentor</b>	<b>Comment Date</b>	<b>Subject Code</b>	<b>Issue</b>	<b>Response/Document Reference</b>
V-361	Cathryn Buford Slater, Advisory Council on Historic Preservation	3/20/98	CH	Relocation, storage, maintenance, and replacement of affected structures will pose serious challenges and add to costs for future rehabilitation.	Please refer to Responses to Comments V-338 and V-358.
V-362	Cathryn Buford Slater, Advisory Council on Historic Preservation	3/20/98	CH	Reintegration of affected buildings into the historic district will be difficult since the essence of the district and relationship between structures will be lost.	Please refer to Responses to Comments V-338 and V-358.
V-363	Cathryn Buford Slater, Advisory Council on Historic Preservation	3/20/98	CH	Concludes that proposed project's impacts are massive and unacceptable, and recommends thorough analysis of a viable Multi-Mode/Low Build proposal.	Please refer to Responses to Comments V-313, V-338, and V-358.
V-363	Cathryn Buford Slater, Advisory Council on Historic Preservation to the President of the United States	3/20/98	CH	Expresses opposition to the proposed project and its effect on cultural resources. Requests a Supplemental EIS and independent analysis of the Multi-Mode/Low Build proposal.	Please refer to Responses to Comments V-313, V-314, V-338, and V-358.

**ATTACHMENT**

**COMMENTS RECEIVED ON ENVIRONMENTAL JUSTICE,  
HISTORIC PRESERVATION, AND OTHER ISSUES**